

Charlotte County Grants Administration Manual



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County Grants Management Policy 4.05 Approved March 14, 2017 by the
Charlotte County Board of County Commissioners



Grants Administration Manual

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CHAPTER 1: PURPOSE, SCOPE, AND AUTHORITY

PURPOSE

The purpose of this manual is to establish uniform guidelines instructing Charlotte County Government personnel in the pursuit of grant funding and the management of grant awards. The manual describes the grants administration policy and procedures of Charlotte County associated with:

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

SCOPE

It is the responsibility of the Grants and Contracts Manager, under the direction of the County Administrator, to implement the grants administration policy and to provide procedures that detail the grant proposal seeking process and the proper execution, management, and close-out of the County's grant awards; and report on the submission and status of grants in a manner that assures transparency and accountability to the Board, grantors, and the public. The grant administration procedures apply to all grants pursued by County personnel and awarded to the Charlotte County Board of County Commissioners (herein referred to as the "BCC" or "Board") and define the roles and responsibilities of employees pertaining to the management of external funding and compliance with prescribed grant and County requirements.

The County will maintain a Grants Administration Manual that sets forth County procedures for administering all awards and pass-through awards in keeping with the requirements of the Uniform Guidance and other applicable statutes, rules, regulations and guidance documents. The provisions contained in this manual are applicable to all County officers, employees, agents, contractors and sub-grantees who perform functions associated with any award or pass-through award.

This manual is not intended to be an exhaustive listing of all rules, regulations, or laws relating to grants administration, but is a guide of standardized procedures to direct County personnel in the application and management of grant proposals and awards. All respective departments are responsible for the creation and maintenance of internal procedures that will be used in conjunction with established County standards. Additionally, each department is responsible for ensuring that County personnel administering grants are trained on applicable regulations governing their respective grant awards. Training may be provided by the grantor agency, an



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outside qualified vendor, or through internal resources. At a minimum, personnel administering federal grants must be trained on the requirements of 2 CFR 200 Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards. The Grants and Contracts Manager will take the lead in establishing internal training on the components of 2 CFR 200 for County personnel.

Definition of a Grant in Charlotte County

A grant is a multi-defined instrument used by government or private entities to subsidize programs and projects that fit within the funding criteria of each respective grantor. Due to their multi-defined characteristic, “grants” can be awarded in the form of: loan contracts, loan guarantees, cooperative agreements, joint participation agreements, contract for services, private contributions, interlocal agreements, and other types of contractual documents. Grants can be unrestricted or restricted, to be used by the recipient in any fashion within the parameter of the recipient organization's activities or for a specific purpose by the grantor. Typically, grants are intended to support a public purpose. Procurement of goods or services for the direct benefit of the organization, and not for a broader public purpose, is generally awarded in the form of a contract.

For the purposes of the Board, a grant is defined as financial assistance awarded to the County from an external entity to carry out a public purpose of support or stimulation, or when specifically identified by the awarding agency, as a “Grant” at the time of award.

GOVERNING LAWS AND REGULATIONS

Federal

- Federal Grant and Cooperative Agreement Act of 1977, as incorporated in Title 31 Section 6304 of the U.S. Code.
- 2 CFR Chapter I, and Chapter II, Parts 200, 215, 220, 225, and 230 - Uniform Administrative Requirements, Cost Principles, and Audit Requirements for federal Awards (a.k.a. the Uniform Guidance). This is often referred to as the Super Circular. Includes former Single Audit Act of 1984 as amended in 1996.
- A-133 Audits of States, Non-Profits, and Local Organizations and Circular A-133, 2015 Compliance Supplement.
- 2 CFR Part 200, Appendix XI, Compliance Supplement.

State

- Florida Statutes, Chapter 125.
- Florida Administrative Code & Florida Administrative Register.
- Rules of the Auditor General, Chapter 10.550, Local Governmental Entity Audits.
- Florida Single Audit Act, Florida Statutes 215.97.



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County

- [Charlotte County Administrative Code Sections](#)
 - 4.01 Equal Employment Opportunity
 - 4.03 County Records
 - 4.05 County Grants Management
 - [Information Technology Appropriate Usage](#)
- [Charlotte County Municipal Code Article VI – Procurement Code](#)
- [Charlotte County Purchasing Manual](#)
- [Charlotte County Policy Personally Identifiable Information \(PII\)](#)
- Charlotte County Policies and Procedures, specifically the following:
 - [3.24 Drug Free Workplace](#)
 - [3.25 Conflict of Interest](#)
 - [Conflict of Interest Policy for Federal Awards](#)
- [Charlotte County Policy on Lobbying Restrictions](#)
- [Charlotte County Policy on Americans with Disabilities Act, and Grievance Procedure](#)

UPDATES AND REVISIONS

This document contains federal, state and county policies that may be revised over time as regulations change, new tools emerge, new processes are designed, and risks change. The Grants and Contracts Manager, in conjunction with the Grants Section of the Fiscal Services Division, will review the procedures described herein and in continued collaboration with the personnel it serves, update this document, as necessary, or as circumstances dictate.



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CHAPTER 2: CHARLOTTE COUNTY GRANTS ADMINISTRATION POLICY

PURPOSE

Grants are an exceptional way to fund County projects; however, they come with the expectation that all work, including the management of the grant award, will follow the highest standards of the regulatory and budgetary requirements of the grantor and the County. Failure to comply with such requirements can lead to a loss of goodwill, the return of awarded funds and/or fines and may also jeopardize future funding from granting entities. Inadequate review of grant proposals or grant awards as well as poor compliance with terms and conditions of grant agreement(s) may lead to the County spending unbudgeted General Revenue funds to support a grant project inconsistent with overall strategic direction or may commit the County to unbudgeted General Revenue spending beyond the grant period. The purpose of this policy is to set forth guidance for the application of grant proposals and the administration of grants awarded to the County that ensure the efficiency and impact of grant funded programs, services, and capital improvements; limit the County's exposure to grant related legal liability; and assure grantors and the public that the County shall discharge its responsibilities with the highest of standards.

POLICY

It is the policy of the Board of County Commissioners that the County will seek grant funding for activities and assets that are determined to further core County functions, or that provide for activities and assets that are in the best interest of the County and its residents. Unless exempted by Board action, all departments and agencies under the authority of the Board shall participate in a uniform grants administration program, under the direction of the County Administrator, that will adequately assess grants prior to submission and ensure that grant award functions follow the highest standards of the grantor or the County. If the Board is participating in the administration of a grant with another government entity or constitutional office, then the other entity or constitution officer shall provide reasonable assurance that their grants administration is in full compliance with state and federal law, including 2 CFR Part 200. A subrecipient agreement may be required.

Grants pursued by the County must be consistent with the County's mission and strategic priorities, and no grant shall be submitted without signature approval of the County's authorized organizational representative or designee. ***Policy Clarification** *Provided that the authority to sign has first been delegated to the County Administrator or his designee (by Resolution or policy within the GAA process), a Department Director or their designee can be named on the Administration designation form for signature authority approval.* Grant applications shall provide reasonable and realistic outcomes that are based on information that will help to best assess the impact and efficacy of grant activities. **Individuals planning to apply for an external grant are requested to notify the Fiscal Services Division Grants Section and the Grants and Contracts Manager at the earliest opportunity for review and analysis.** Notification shall be



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provided via completion of the Grant Pre-Application Risk Assessment Form in the GrantTracking Site (GTS), which will be reviewed by the Grants and Contracts Manager and Fiscal Services Division. The GrantTracking Site will notify the user of the approval to proceed and require the user fill out the necessary forms needed to request approval to submit the grant application. All grants will be tracked in a manner that assures transparency and accountability to the Board, grantors, and the public.

Funding Analysis

Grants that align with the strategic priorities of the County shall be analyzed by the Grants and Contracts Manager, in conjunction with the Fiscal Services Division, to examine the total effects and costs to the County due to matching requirements or new operating costs; allowance of indirect costs; whether General Fund revenues are necessary to cover the gap between cash expended and revenues received; and whether County General Fund revenues are necessary to support the project after the expiration of the grant.

Analysis of Grant Renewals and Continuations

At the end of the initial grant period, all grants shall be evaluated to determine the extent to which the grant project has produced desired benefits. The Grants and Contracts Manager will initiate this review in conjunction with Fiscal Services and the recipient department. Such an analysis shall include a review of actual costs to determine whether using General Fund revenues associated with the grant could be better used for other purposes that are better aligned with the County's mission and strategic priorities. Grants awarded on a multi-year basis shall be evaluated through a cost effectiveness analysis that relates the project's cost to its key outcomes or benefits to determine the extent to which they have produced positive, meaningful outcomes that provide cost effective services or improvements.



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CHAPTER 3: ROLES AND RESPONSIBILITIES

All County personnel who are engaged in the preparation of grant proposals and administration of grant awards, including staff responsible for grant funded assets, serve an important role ensuring that all grant terms, conditions, and regulatory requirements are met.

Below are the “key players” in the management and administration of grant funded projects received by the County and a representational list of the responsibilities.

BOARD OF COUNTY COMMISSIONERS

All grant applications and other grant documents require authorization by the Board for submission, unless otherwise designated by Resolution. The Chair will sign as the Authorized Representative on behalf of the Board. Legal review is required for all grant applications and grant award agreements.

COUNTY ADMINISTRATOR

The County Administrator, or his or her designee may sign all grant applications, amendments, and other grant documents as the Authorized Representative on behalf of the Board upon authorizing Resolution approved by the Board. If allowed by authorizing Resolution, the County Administrator may execute some recurring grant agreements and related documents without formal acceptance of the Board.

FINANCE DEPARTMENT

The Finance Department, as a division of the Clerk of the Court, is involved with grants from the financial perspective. The Finance Department has responsibility for Accounts Payable, Accounts Receivable, and General Ledger functions. The Finance Department also annually produces the SEFA (Schedule of Expenditures of Federal Awards) and works with the external auditors by providing them with documentation to perform the Single Audit. Additionally, Finance validates that expenditures being sought for reimbursement are properly charged in Project Accounting and the General Ledger to ensure completeness for audit trail purposes.

GRANTS AND CONTRACTS MANAGER

The Grants and Contracts Manager will enforce Board policies and procedures, providing organizational oversight and accountability, as related to grant compliance. Under the direction



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of the County Administrator, this position implements the County Grants Management Policy and provides processes and procedures for the submission of grant applications and the management of grant awards; and reports on the submission and status of grants in a manner that assures transparency and accountability to the Board, grantors, and the public. County Administration provides a centralized point of contact for assistance with the identification, preparation, distribution, and submission of grant documents.

TRAINING

The Grants and Contracts Manager will provide training to the departments on the components and use of this manual; as well as tools to manage grants and comply with federal, state and local requirements. Outside professionals may be brought in to assist with training as needed. Specific programmatic training is often provided by Grantor agencies and County personnel are encouraged to attend grant specific training.

Additional Meetings between the Grants and Contracts Manager and Grant Coordinators will be coordinated and scheduled on a reoccurring basis.

It is each department's responsibility to ensure staff working with grants are properly trained on grants management and compliance requirements, including fiscal and programmatic compliance. This also includes training provided by the granting agency.

FISCAL SERVICES DIVISION / BUDGET & ADMINISTRATIVE SERVICES DEPARTMENT

The Fiscal Services personnel, including Financial Managers, Senior Financial Analysts and Financial Analysts, will provide fundamental fiscal support to County departments and agencies to ensure that grantor and County regulatory and budgetary policies and procedures are followed.

DEPARTMENTS AND AGENCIES

Department Director

The department director is a manager with programmatic and fiscal responsibilities for a designated department. He or she ensures adequate resources are provided to staff for the appropriate conduct of project management duties and grant award management and supervises staff members who may serve as grant coordinators, fiscal contacts, and support staff for grant awards. Responsibilities include:

1. Establishing departmental standard operating procedures to ensure the following:
 - Ensure there are established processes for timely submission of all necessary documents in the GrantTracking Site.



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- Ensure that department personnel are properly trained and qualified to carry out the tasks related to administering the grant.
 - Ensure the accuracy of programmatic reports.
 - Ensure that critical reporting timelines are met.
 - Ensure the grant is in compliance with all applicable regulations.
2. Identify a Grant Coordinator for each grant and ensure the following:
- Ensure each Grant Coordinator is familiar with the grant guidelines.
 - Complies with the parameters outlined in this manual.

Grant Coordinator

The Grant Coordinator is the departmental designee who is responsible for the administration of each grant and ensures that the processes and procedures outlined in this manual are followed. A Grant Coordinator may be the department's Grants Analyst, Project Manager or other individual assigned to coordinate all grant-related activities within the department and is the primary contact for grant related inquiries.

Following is a list of the Grant Coordinator's responsibilities:

1. Research program requirements prior to submitting a grant application. Notate the Granting Agency's federal and state regulation that need to be adhered to.
2. Send a copy of the application requirements to the Grants and Contracts Manager for review.
3. Arrange sign-on permissions for internet access at grant site.
4. Prepare and submit through GrantTracking Site the Grant Pre-Application Risk Assessment Form to determine if the department has the capacity to properly implement and manage each program associated with a grant.
5. Coordinate the preparation and submission of a grant application.
6. Provide additional information as needed, to the County Attorney's Office on the submission of Legal Service Requests of grant application or acceptance.
7. Create the Legistar Agenda Item for grant application and/or acceptance, when instructed by the Grants and Contracts Manager.
8. Verify multi-departmental processes and procedures are properly followed, i.e., purchasing procedures, records retention etc.
9. Coordinate with Purchasing on the Granting Agency's Provisions to be added to Procurements and Contracts.
10. Coordinate and monitor subrecipients.
11. Establish a thorough tracking and reporting process.
12. Submit timely and accurate reports.
13. Monitor the performance and outcomes of the programs associated with a grant.
14. Coordinate, prepare, and participate in all required monitoring reviews and audits.



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15. Provide the proper closeout and coordinate the retention of required program records with Records Management at the conclusion of each grant.
16. Place program related documents including contracts into the appropriate folder on the GrantTracking Site.

The Grant Coordinator will be responsible for communicating program status and outcomes with various levels of staff and management, and with representatives at the local, state and federal agency as applicable.

Fiscal Contact

A Fiscal Contact typically will reside within Fiscal Services but may also reside within the department receiving a grant. The Fiscal Contact is responsible for managing the financial requirements and maintaining the award record in the County's financial system. Although some tasks may be delegated, the Fiscal Contact is the chief accountable person for the overall fiscal conduct of the grant award and meeting the budgetary terms and conditions of the award, and for representing the accounting of the project to the grantor.

Following is a list of responsibilities for the Fiscal Contact:

1. Prepare budget portion of grant requests in coordination with Grant Coordinator and/or Department Director.
2. Generate grant project numbers and set up new accounts.
3. Assign split funding cost accounting for staffing and budget items.
4. Submit all required documents necessary to satisfy periodic reporting requirements on a timely basis.
5. Prepare and submit financial reports in accordance with grant requirements and deadlines.
6. Request grant reimbursements in accordance with the Grants Administration Manual.
7. Provide financial information, statistical data, and analysis as needed and necessary.
8. Monitor the funding and expenses associated with the grant including subrecipients.
9. Coordinate, prepare, and participate in all required monitoring reviews and audits.
10. Provide the proper closeout and retention of required fiscal records at the conclusion of each grant.
11. Place fiscal related documents into the appropriate folder on the GrantTracking Site.
12. Communicate the financial status of the grant with the Grant Coordinator, Department Director, Financial Manager and Grants and Contracts Manager.

COUNTY ATTORNEY

The County Attorney's office provides legal advice, counsel, and legal representation to the Board of County Commissioners, the County Administrator and the departments of the County.



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All grant documents going before the Board or County Administrator for approval and signature require legal review, including applications, agreements, amendments, extensions and subawards. To obtain legal review, a Legal Service Request form will be completed in the [GrantTracking](#) Site and submitted to Legal by the Grants and Contracts Manager with the grants package. Once received by the County Attorney's office, a file number will be assigned that should be used with all correspondence with the County Attorney's office.

CLERK OF THE CIRCUIT COURT

County Internal Auditor

The County's Internal Auditor advises and assists the Board in conducting continuing studies of the operation of County programs and services. The Internal Auditor's work may include audits of all aspects of the County's offices and officials.

County Auditor

The Clerk of the Circuit Court is responsible for the official financial records of the Board, and in that capacity, is responsible for maintaining adequate records to ensure compliance with federal and state accounting and reporting requirements for all grants administered by departments under the Board. The Clerk is also the internal auditor of County departments, and conducts independent, objective reviews and evaluations of all relevant activities under the Board and coordinates the Single Audit with Board departments and the County's external auditors.

As such, the Clerk's Audit Department examines and evaluates the internal control systems and procedures County departments use to carry out the assigned responsibilities of the organization being audited, including the implementation requirements of a department for administering grant funds.



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CHAPTER 4: PRE/POST AWARD - GRANT IDENTIFICATION, APPLICATION, AND TRACKING

* Exceptions to the process do exist and are handled on a case-by-case basis

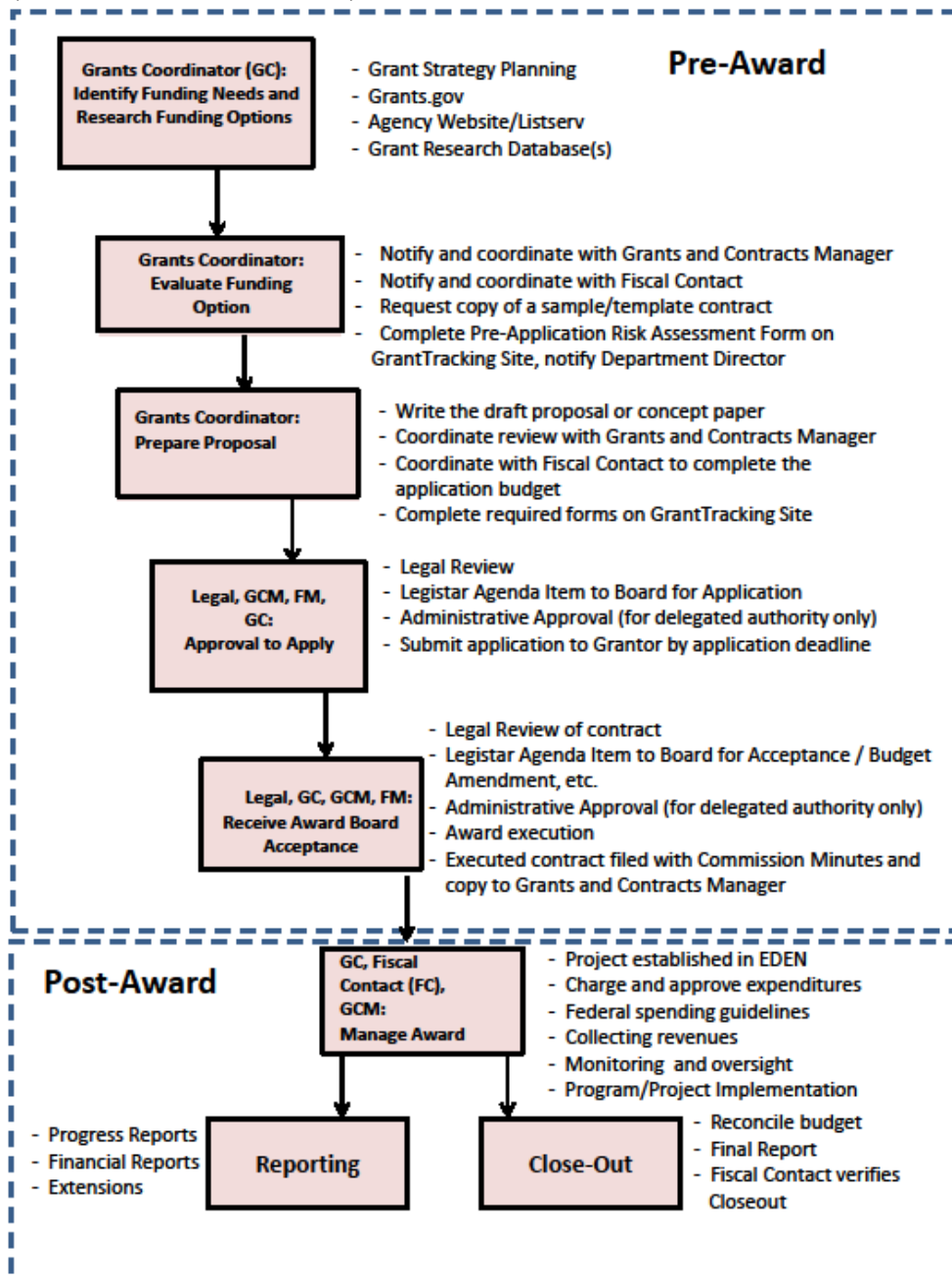


Illustration of Grant Pre-Award and Post-Award functions.



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GRANT IDENTIFICATION/RESEARCH

Departments can use the following sources to locate funding for county projects:

- Grants.gov (<http://www.grants.gov/>): Grants.gov is the clearinghouse for all federal grant opportunities and allows organizations to electronically find and apply for and manage federal grant funds online through a common web site.
- State Funding Opportunities (<https://apps.fldfs.com/fsaa/catalog.aspx>): CSFA site is a statewide compendium of state projects that provide financial assistance to non-state entities.
- Regional/Local Funding Opportunities
- Foundations
- Legislative Appropriations (submitted through the legislative policy process)
- Agency Websites and Listservs
- Federal Register (<https://www.federalregister.gov/>)
- Grantsolutions.gov (<https://home.grantsolutions.gov/home/>): GrantSolutions.gov is a comprehensive grants management system that allows applicants to apply for, manage, and report on the use of U.S. government funds for multiple programs such as federal Health & Safety funding.
- RGMS Portal (<https://caia.treasury.gov/>) Restore Act

GRANT SEEKING PROCESS

The grant seeking process consists of the development of departmental grant strategy planning, a pre-application assessment and review.

- Grant Strategy Planning: To maximize potential funding capacity it is suggested that each department seeking grant funding for capital projects provide a prioritized list of needs that can potentially be met through grant funding; and submit to the Grants and Contracts Manager, the Capital Projects Manager and to Fiscal Services in order to identify potential funding opportunities that may have redundant submissions or collaboration among departments, and advance pre-planning to assist department's in the submission of proposals. An interdepartmental committee may be established to review current and upcoming projects to determine the need for outside financial assistance and coordination of grant submissions.
- Pre-application Assessment and Review: The department initiating the grant application and the Grants and Contracts Manager will perform a review to assess whether:
 - a. The funding opportunity aligns with the department's core mission and the County's strategic priorities.
 - b. The department has the required match (cash/in-kind).



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- c. The program/project is sustainable without additional funding.
- d. The department is able to fund potential long-term operations and maintenance cost without budgetary increases.

It is required that departments receive written approval from the Board, or authorized designee by Resolution, both before APPLYING and at ACCEPTANCE of grant funds. Draft application preparation prior to board approval is for the sole purpose of coordination and reference. Each grant proposal will be reviewed and analyzed by the initiating department in consultation with the department's assigned Grant Coordinator, Fiscal Contact, and Grants and Contracts Manager. Do not submit a formal application to any grantor without BCC formal approval, and do not accept funding from any grantor prior to BCC formal grant adoption.

APPLICATION PREPARATION

Preparing the application is primarily the responsibility of each respective department with support from the Fiscal Contact. There are certain essential elements necessary for successful submission of a grant application that must be attended to prior to filling out the grant application.

1. Electronic proposal preparation and submission is becoming the norm for grants administration. The Grants and Contracts Manager will assist in coordinating roles designated for all external web-based grant portals, as each portal defines roles differently which may involve County Administration, County Attorney, Clerk of the Circuit Court, Fiscal Services, and individual departments. Contact the Grants and Contracts Manager with sufficient time from the proposal due date to make certain that the County is properly registered in a particular system. It is important that the appropriate programmatic and fiscal personnel are established within these systems for access and award application/management. The following are examples of the various web-based portals in which the County is registered:
 - a. Grants.gov
 - b. System for Award Management (SAM)
 - c. Automated Standard Application for Payments (ASAP)
 - d. FEMA e-Grants and PARS (Payment and Reporting System)
 - e. Grant Solutions (for RESTORE Act)
 - f. Department of Justice Grants Management System (GMS)
 - g. Department of Justice Grants Management System (Just Grants)
 - h. Department of Justice Grant Payment Request System (GPRS)
 - i. e-Grants (Florida Department of Economic Opportunity)
 - j. Federal Transit Administration Transit Award Management System (TrAMS)
 - k. Federal Transit Administration Grantee Payment Request System (ECHO)
 - l. United States Department of Agriculture RD Apply
 - m. Florida Department of Transportation Local Agency Program Information Tool (LAPIT)



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- n. Florida Department of Transportation Specs on the Web (TransCIP)
- o. Southwest Florida Water Management District (SWFWMD) Cooperative Funding Initiative

TYPES OF GRANT FUNDING

1. Block Grant (also referred to as a “formula” grant) - A broad intergovernmental transfer of funds or other assets by the U.S. Congress to state or local governments for specific activities such as justice initiatives, housing, health, and human services, but with assurances required. Block grants are distributed according to legal formulas defining broad functional areas such as health, income, security, education, or transportation.
2. Discretionary Grant - Non-formula grants that use competitive procurement methods to distribute funding. A Competitive Grant is an award of financial assistance in the form of money, or property in lieu of money, by the Federal or State Government to an eligible grantee, usually made based on a competitive review process.
3. Cooperative Agreement & Contract - Types of Federal or State assistance; essentially, a variation of a discretionary grant, awarded by a Federal or State agency when it anticipates having substantial involvement with the grantee during the performance of a funded project.
4. Special Projects (also known as Earmarks, Appropriations or Member Projects) - designate a certain source of revenue for specific projects made at the request of a legislator. Typically, the County submits requests for projects to State and Federal legislators who seek to obtain funds for those requests, usually to be spent in the district the legislator represents. Special Projects bypasses the normal competitive grant review procedure by which revenues are allocated into a general fund, then divided among various government programs. Most Special Project allocations are administered through State and Federal agencies who will require a Scope of Work and Contract after the legislation has been approved and before funds can be expended. Federal and State grant compliance regulations, i.e., 2 CFR 200, often apply to Special Projects.
5. Formula Grant - Are usually Block Grant funds. A Formula Grant is a grant that a Federal or State agency is directed by Congress to make to grantees, for which the amount is established by a formula based on certain criteria that are written into the legislation and program regulation. This funding is directly awarded and administered in the Federal or State agency’s program offices or may be a pass-through grant to another unit of government.
6. Loan Agreement - Charlotte County frequently takes advantage of loans offered by the State and Federal government who offer reduced interest rates for capital projects. These loans may also follow grant compliance regulations.



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7. Pass-Thru Grant - Grant funds originate with one grantor but pass through to another grantor. Such as from one Federal Agency to a State Agency to local government.

Writing the Grant Proposal

It is the initiating department's responsibility to prepare and submit the grant proposal application. However, the Grants and Contracts Manager and Fiscal Services staff are available for assistance and guidance to help you prepare a successful proposal.

Read the grant guidelines thoroughly. Grant application guidelines identify what to include in the respective grant proposal, and it is critical to understand the grantor's requirements and to follow grant application guidelines explicitly. Request a sample/template contract in order to budget for contract award compliance. Structure, attention to specifications, concise, enthusiastic/persuasive writing, and a reasonable budget, with justification narrative, are the critical elements to be considered during the writing stage.

Grant guidelines typically identify:

1. Submission deadlines.
2. Grantee eligibility.
3. Funding goals, priorities, and ceilings.
4. Proposal format: forms to use, page limitations, page margins, line spacing, etc.
5. Budgets and budget justification narrative.
6. Proposal evaluation process, criteria, timetables.
7. Point(s) of contact.
8. Allowable supplemental materials, such as Letters of Support.
9. Required certifications and assurances.
10. Any and all other submission requirements.

All Letters of Support: The Grants and Contracts Manager may be available to assist the respective department in obtaining any required or supplemental Letters of Support.

ELECTRONIC FILE STORAGE REQUIREMENTS

File management is an important aspect of grants management. Auditors will refer to the documentation as well as financial data when auditing a grant program. The purpose of the GrantTracking Site is to have one place where all information related to a grant can be found quickly and easily. To that end, all relevant correspondence associated with the grant will be stored using naming conventions that are effective in data mining processes. Files stored should consistently contain the name of the project; followed by the year the grant is approved for. For



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recurring grants change only the year of the grant in order to distinguish it from the previous year's grant, but otherwise retain the same grant name.

In addition to the grant name, consistent use of grant project numbers in EDEN, the County's electronic financial accounting system, is also important. When recurring projects occur, only change the fiscal year of the project. With consistent grant naming and project number sequencing, the projects will be clear and data mining will be easy. Non-consistency hampers data mining.

SUBMITTING A REQUEST FOR APPLICATION APPROVAL

Internal Process for Proposal Submission

No grant shall be submitted without signature approval of the Board, or authorized designee by Resolution.

The initiating department should notify the Grants and Contracts Manager a minimum of 60 days prior to the grant application deadline, **or as soon as** the grant opportunity is available or brought to the attention of the department, to secure sufficient time to prepare the proposal and get on the Board agenda for approval. The Fiscal Services, Grants Section is also available to assist with budget development in the preparation of the proposal.

1. Grant Pre-Application Risk Assessment Form (RAF)

The grant approval process begins by the interested department completing a Grant Pre-Application Risk Assessment Form (RAF) in the GrantTracking Site. An example of the RAF is at Exhibit 1. The RAF is an internal form and will be completed prior to applying for a grant. The department considering the grant application will be responsible for completing the RAF. This process should be done in consultation with the department's Fiscal Contact and Grants and Contracts Manager. Various types of risk are associated with the acceptance of grant funding. It is important to review the risks associated with each grant prior to accepting funding.

Items to consider when assessing risk include:

Financial Considerations

- a. Total anticipated grant costs.
- b. Matching requirements. This includes types of match and the source of the matching funds that are needed.
- c. Program income considerations.
- d. Staff time spent on the grant application.



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- e. Staffing requirements for the grant itself. This includes both administrative staff time and program staff time. Consider the timeframe for the grant, employee type (regular, part-time, contract).
- f. A continuation plan of the grant funding if needed.

Programmatic Considerations

- a. Alignment with the County's strategic goals.
- b. Possibility of continuation of the program once the grant funding has ended.
- c. Using the RAF, detail the County's programmatic responsibilities if the program is continued.
- d. Staff's knowledge of the programmatic requirements of the grant.
- e. Partnerships, community involvement.
- f. Required Memorandums of Understanding (MOUs) with partner agencies.
- g. Possible duplicative services already in the community.

Once all of the information is gathered, the form will be submitted through the GrantTracking site for approval by the Department Director, Financial Manager, and Grants and Contracts Manager. If a determination is made that the grant would not be feasible for the County to pursue after review of the RAF, then the completed form -shall be kept on file at the department and Grants and Contracts Manager for future consideration.

2. GRANT CHECKLIST

The initiating department will complete the Grant Checklist (Exhibit 2) which is a document summarizing the grant proposal and will accompany the Legistar Agenda Item for Board review.

3. LEGAL and ADMINISTRATIVE REVIEW GAA (FOR APPLICATION APPROVAL)

Once the Grant Pre-Application Risk Assessment Form is approved by the Department Director, it moves to Grants and Contracts Manager and Financial Manager for approval in the GrantTracking Site. The initiator will complete the checklist, Legal Service Request, Grants Administrative Approval Form and County Administrator Signature form and upload the draft application, with appropriate support documentation of grant program and requirements. The Grants and Contracts Manager and Financial Manager will approve the final package and send for legal review. The appointed Legal representative, appointed through the Legal Service Request (LSR), shall review the application to make sure the County is able to meet all requirements of the grant program. All prerequisite legal work will be completed, including drafting any necessary resolutions and reviewing the certifications and assurances for compliance.

4. Legistar AGENDA ITEM (APPROVAL TO APPLY)



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Once the Grant Pre-Application Risk Assessment Form is approved by the Department Director, the file moves to the Grants and Contracts Manager and Financial Manager for approval in the GrantTracking Site. The user will complete the checklist, Legal Service Request, Doc Processing form and upload the draft application, with appropriate support documentation of grant program and requirements. The Grants and Contracts Manager and Financial Manager will approve the final package and send for legal review. After being instructed by the Grants and Contracts Manager, the initiating Department Director, along with the Grant Coordinator, will create a Legistar Agenda Item requesting permission from the Board to apply for the grant. Timing of the Legistar Agenda Item may be critical depending upon the grantor deadline. Legistar Agenda Items are required to be entered into the Legistar system by the department three (3) weeks ahead of the Board meeting. The Legistar Agenda Item must include specific information regarding the grant under consideration. Key points to include in the request are:

- a. Requesting the Board to approve the application of the grant.
- b. Estimated funding in the grant request.
- c. Type of grant.
- d. Description of the grant purpose and objectives.
- e. Funding method.
- f. Source of match.
- g. Name of the Federal or state agency administering the grant.
- h. Estimated number of jobs retained or created.

An example of a Legistar Agenda Item and associated requirements is in Exhibit 3 of this manual. The Legistar Agenda Item is placed on the Board schedule under Consent Agenda. A department representative shall attend both pre-agenda and the Board meeting to answer any questions that may arise.

Generally, discussions regarding the request are completed prior to the Board meeting. The Board meeting completes the approval process to apply, and the initiating department is authorized to formally submit the application to the Grantor upon signature.

Note: If a department finds that due to time restraints, they are unable to wait for a Board meeting for approval to apply for a grant, then the County Administrator can sign approval using the Grant Administrative Approval Form (Exhibit 5). Legal and administrative review is still required through an LSR as described above. If Board ratification is necessary, it will be placed on the agenda for the next available Board meeting.

CHAPTER 5: AWARD NOTIFICATION, REVIEW, and ACCEPTANCE PROCEDURES



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Grant agreements are legal contracts. It is the County's responsibility to carry out grant activities to accomplish its objectives, while adhering to the regulatory and budgetary terms and conditions prescribed by the grantor in the grant agreement. Failure to do so exposes the County to legal liability and compromises current and future grant funding. The County carries a significant legal and ethical responsibility when accepting grant funding, and management of grant awards requires heightened awareness throughout the organization.

AWARD NOTIFICATION, REVIEW, AND NEGOTIATION

1. If the grantor intends to negotiate the award and in particular, reduce the budget, the proposed scope of work may be commensurately reduced to ensure the grant can still be accomplished within the revised budget or timeframe proposed by the grantor.
 - a. If the award terms are negotiated to the initiating department's satisfaction, the department must request that the grantor provide the changes in writing. The changes may be incorporated in the grant agreement or contract, memorandum of understanding, and/or any other related grant or contract documents.
 - b. In the event that the department, in coordination with the Grants and Contracts Manager, determines it cannot perform the scope of work as revised or with a decreased budget, and cannot arrive at an agreeable position, the County can choose not to accept the award. This will occur through written correspondence from the initiating department that will clearly specify the reason(s) the award is being declined.
2. Once the award scope and budget are agreed upon, an award will be presented by the grantor. The grant award or grant contract may be delivered to the County through hardcopy, docu-sign or email to the identified County Project Manager, Board Chairman, departmental Grant Coordinator or the Fiscal Contact person listed in the application. Grantor agencies are also using electronic portals for grant applications, submissions and award management. Below is a list of some of the portals that are currently used with Charlotte County grants. It is important that usernames and passwords are not shared with others and only used by the authorized person.
 - a. Grantsolutions.gov used for RESTORE Act
 - b. Grants Management System (GMS) used by DOJ (Department of Justice) as well as JustGrants.usdoj.gov
 - c. e-Grants portal used by FEMA (Federal Emergency Management Agency)
 - d. Performance and Accountability for Grants in Energy (PAGE) used by U.S. Department of Energy
 - e. Integrated Disbursement and Information System (IDIS) used by HUD (Housing & Urban Development)
 - f. Disaster Recovery Grant Reporting System (DRGR) used by HUD
 - g. Any other e-portals from various granting agencies



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3. The County Attorney's Office shall conduct a legal review of the grant agreement to assess whether the terms and conditions of the agreement are legally enforceable and ensure the County's interests are protected.
 - a. The initiating department shall submit through the GrantTracking Site, a request for approval to accept the agreement from Grants and Contracts Manager and Financial Manager. Expedited review is to be requested only if time constraints require or for other good cause shown*. If the legal review identifies no issues with the terms and conditions of the agreement, the Board agenda item will proceed for Board consideration and approval.
 - b. If the grant funding has been approved by the Board as part of the budget process; and the grant program is specified in a delegated authority Resolution, the initiating department may complete and submit a Grant Administrative Approval Form (Exhibit 5) to obtain authorization to accept the grant. Legal review is still required.
 - c. If the legal review identifies any issues with the terms and conditions of the award, the initiating department will facilitate with the grantor to resolve the issue. If the County and grantor cannot arrive at a mutually agreeable position, the Grants and Contracts Manager shall review, and the County may choose not to accept the award. This will occur through written correspondence from the initiating department that will clearly specify the reason(s) the award is being declined.

*Good cause must be shown in order to request an expedited review. The department must submit in writing the reason for the time constraint and provide documentation that the time constraint was outside of their control.

Legistar AGENDA ITEM TO BOARD (ACCEPTANCE AND APPROPRIATION)

1. The initiating department is responsible for ensuring approval to accept the award is completed by the date required by the grantor for full execution.
2. The initiating department prepares and submits the Legistar Agenda Item (Exhibit 4) when instructed by the Grants and Contracts Manager, which must include specific information regarding the award under consideration. Key points to include in the request are:
 - a. Requesting Board approval of the grant award.
 - b. Amount of the award.
 - c. Requesting approval of the Resolution for the budget amendment.
 - d. Authorization for the Board Chair or designee to sign all documents associated with the grant.
 - e. Description of the project or program funded by the grant.
 - f. Expected outcomes of the project.
 - g. If a subaward is included, identify the amount and subrecipient(s) involved.



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3. The item is placed on the Board agenda under Regular or Consent Agenda. A department representative shall attend both pre-agenda and the Board meeting to answer any questions the Board may have. A guide for completing the Agenda Item is at Exhibit 4.
4. Following Board execution and appropriation of the grant award, the initiating department is responsible for submitting the grant agreement and related documents to the grantor.
5. The applicant department provides an original of the fully executed grant agreement to Commission Minutes and sends a copy to the Grants and Contracts Manager and Fiscal Services Grants Section when the fully executed grant award is returned to the County by the grantor.

AWARD AND PROJECT SETUP IN EDEN

EDEN is the Charlotte County Board of County Commissioner's financial software that is used for fund accounting. In addition, EDEN's project accounting provides multi-year tracking of budgets, expenditures, and revenue for user-defined projects such as grants, capital improvements and special programs.

1. Upon receipt of a fully executed grant agreement, the Fiscal Contact shall:
 - a. Ensure that the grant project is created in EDEN Project Accounting, unless the funding is fully tracked within a grant specific org/cost center. Project numbers and naming conventions are assigned and managed by Fiscal Services to avoid duplication and indistinguishable names.
 - b. Coordinate with Clerk Finance to establish general ledger accounts in EDEN.
2. Ensure that the grant award has been integrated into any applicable Capital Improvement Program (CIP) project for any grants that partially or wholly fund a CIP project.
3. Ensure that the grant project is set up in GrantTracking allowing grant documentation to reside and be retrieved from a singular location accessible across departments, as well as, Clerk Finance.
 - a. Standardized list of documentation that should be uploaded to the GrantTracking grant folder is as follows:
 - i. Grant application
 - ii. Grant award notification
 - iii. Executed grant agreement/contract/ Addendums or amendments to contract
 - iv. Correspondence with awarding agencies
 - v. Funds Received/ Grant Reimbursement Payments
 - vi. Board (Legistar) agenda item or delegated authority



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- vii. POs Invoice/Cancelled Checks
 - viii. Property Records Disposal
 - ix. Project Adjustments
 - x. Reconciliations
 - xi. Reimbursement reports- Financial Reports
 - xii. Purchasing documents and authorizations
 - xiii. Procurement Documents
 - xiv. Other Irregular Documents- FEMA/MAC
 - xv. Sub-recipient Agreements
 - xvi. Sub-recipient Reports
 - xvii. Status Reports or other Programmatic Reports
 - xviii. Audit Reports
 - xix. Audit Comments
4. For recurring grants that have been appropriated by the Board of County Commissioners during the budget process, yet the agreement has not been executed with the grantor, Fiscal Services may create projects in EDEN based on the approved budget to facilitate tracking allowable expenditures for the next grant cycle. Project accounting will be adjusted accordingly if any change is made to the awarded budget or allowable costs for the grant.



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CHAPTER 6: MANAGING THE GRANT

MONITORING AND OVERSIGHT OF THE GRANT

Compliance Monitoring

The post-award activity of an awarded County grant is overseen by the Grants and Contracts Manager through regular communication with the departmental Grants Coordinator. The Grants and Contracts Manager will be responsible for:

1. Monitoring activities under the grant scope of work to assure compliance with applicable requirements and to ensure that performance expectations are being achieved. Monitoring of the grant must cover each program, function or activity. The departmental Grant Coordinator is responsible for ensuring that activities comply with the Terms and Conditions of the grant agreement/contract and ensuring that required reports are submitted by or before the specified deadlines in the award agreement.
2. The Grant Coordinator is the liaison with the grantor regarding program performance, operational requirements and monitoring, and will supervise all programmatic (operational) aspects of the grant in accordance with the terms and conditions of the grant. He or she is responsible for conducting or coordinating all internal program monitoring and ensuring preparation and submission of all required program reports by or before the specified deadlines in the award agreement.
3. The Fiscal Contact is responsible for ensuring that essential support and control is provided to the recipient department so that the grant awarded ends successfully and in compliance with all budgetary policy and procedures.

FISCAL ACCOUNTABILITY

Management of Federal Cash

In order to minimize the time elapsing between the transfer of funds per 2 CFR 200.305, Charlotte County will only request advance payments to cover expenses and invoices that are ready to be paid within three (3) business days after receiving funds. Payments must be deposited and maintained in interest-bearing accounts. Advances should not be requested for encumbrances in which services and invoices have not been received unless there is a certainty that invoices will be received and paid within these established guidelines. Payments to subrecipients are limited to immediate cash needs.

Interest earned up to \$500 per year may be retained for administrative expense. Any additional interest earned on Federal advance payments deposited in interest-bearing accounts must be



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remitted annually to the Department of Health and Human Services Payment Management System (PMS) through an electronic medium using either Automated Clearing House (ACH) network or a Fedwire Funds Service Payment. Refer to 2 CFR 200.305(b)(9) for specific instructions.

Receipt and Use of Grant Funds

1. No grant funds shall be disbursed until a Board agenda item and appropriation request have been approved by the Board or delegated authority by Resolution, a project has been created in EDEN Project Accounting, unless the funding is fully tracked within a grant specific org/cost center in EDEN, and required documentation is complete.
2. Grant funds may only be used for grant related expenses and expended within the period of performance identified in the grant agreement.
3. Departments receiving grant funds shall adhere to County policy and procedures regarding revenue collection and accounting and reporting of grants received by the County.
4. Amendments or reallocations to the awarded budget that alters the grant amount or moves funds from one budget line item to another must adhere to grantor and County policy and procedures.
5. Grant funds awarded to the County shall not be used to supplant an existing expense so that current funds can be diverted to another use, unless such use of grant funds is explicitly identified as allowable in writing by the grantor in the grant award.
6. All income resulting from a grant funded project or program shall adhere to County revenue and grants policy and procedures, and managed and maintained as established in the grant agreement.
7. All procurement activity associated with grant funded projects or programs shall follow the grantor and County policy and procedures for procurement of goods as outlined in the most current Purchasing Manual, available on the County's Intranet site. **It is the Grant Coordinator's responsibility to notify the Purchasing Division of the existence of any and all grant conditions when requesting a procurement using grant funds.**
8. All property and equipment acquired through grant funds shall follow the grantor and County policy and procedures for property or inventory control.
9. All grant and related matching revenues and expenditures shall be recorded in the EDEN accounting platform.



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Determination of Allowable, Allocable and Reasonable Costs

Cost Overview

Grant funds must be spent in accordance with the terms and conditions of the grant award. Therefore, prior to expending grant funds, the Grant Coordinator and Fiscal Contact must be aware of what costs are allowable and disallowable under the grant as well as what costs are considered direct and indirect.

Allowable costs shall be adequately documented and fit the definition for an authorized expenditure as stated within the cost principles as:

- a. Allocable, reasonable and necessary
- b. Treated consistently as a direct or indirect cost
- c. Determined in accordance with Generally Accepted Accounting Principles (GAAP)
- d. Net of all applicable credits
- e. Not included as a cost to meet matching requirement of another federally-funded grant
- f. Conforms to limits or exclusion on types or amounts of costs as stated in cost principles, federal laws, and terms and conditions of grant award
- g. Consistent with policies and procedures that apply uniformly to federal and non-federally funded activities

A cost is *allocable* to a grant if the goods and services purchased are related equitably to the benefits received by the funded program. A cost must also be incurred specifically for the award, benefit the award, and be *necessary* to the overall operation of the organization. A cost can be considered *reasonable* if, in both its nature and amount, it does not exceed that by which a prudent person would incur at the time the decision was made to incur the cost.

Allowability and Authorization

It is the department's responsibility to determine if a cost is allowable under the grant program. Typically, the determination would fall under the responsibility of the Grant Coordinator; however, the Department Director may delegate the responsibility to another qualified staff, such as a Project Manager.

1. Grant Coordinator will establish the grant proposal budget in consultation with the Fiscal Contact and submit to the Granting Agency with application and/or acceptance of the grant agreement.
2. Fiscal Contact, or Fiscal Services designee, will prepare budget amendment to recognize grant revenue and expenses in the general ledger; and set up project accounting in financial software using unique identifiers for grant funded goods/services. Fiscal Contact, or Fiscal Services designee, will communicate the project and general ledger accounts to use for the grant program to the Grant Coordinator.



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3. Grant Coordinator, or other delegated staff, **must notify Purchasing Division** whenever federal or state funding is used prior to the preparation of bid documents, requests for proposals, purchase orders, or other purchasing methods.
4. Grant Coordinator, or other delegated staff, will review purchases, purchase orders, contracts, invoices and salaries for allowable grant costs prior to authorization.
5. Grant Coordinator will coordinate with Fiscal Contact on any proportional costs applied to a grant.
6. Fiscal Contact will review grant transactions and confirm for completeness, timeliness and accuracy of expense; and for allocable costs will determine proportion of cost that can be applied to the grant.
7. Fiscal Contact, or Fiscal Services designee, will perform routine reconciliation of grant program transactions in the general ledger and project accounting and will complete and enter journal entry and project adjustments as needed.
8. Grant Coordinator will notify Fiscal Contact of any purchasing or contract changes during the grant cycle; and will submit to the Granting Agency any requests for changes to the agreement.
9. Fiscal Contact, or Fiscal Services designee, will perform cash flow and projections for grant budget and complete budget adjustments to the general ledger and project accounting as needed.
10. Fiscal Contact will coordinate with Grant Coordinator, or other delegated staff, to obtain supporting documentation as required by the Grantor used in the preparation of financial reporting including reimbursement requests, claims, and draws. The supporting documentation will demonstrate a cost is reasonable, necessary or allocable if it impacts a cost's allowability.

Equipment and Real Property Management

1. Equipment purchased with grant funds shall be used exclusively during the life of the grant for the project or program for which it was acquired.
2. Equipment purchased with grant funds must be properly maintained and safeguarded, and equipment records must be maintained per County inventory policy and procedures. This includes identifying grant funded acquisitions on fixed asset inventory under the column marked "restricted/grant funded." It is the Grant Coordinator's responsibility to notify the Purchasing Division when fixed assets are purchased with grant funds and must be identified as a grant funded acquisition on the fixed asset inventory.
3. Recipient department must comply with the grantor's requirements to report annually or per designated time period on the status of equipment and real property acquired with grant funds. All reporting requirements will be coordinated with the Grants and Contracts Manager.



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4. After the grant award is closed and equipment is no longer needed for its originally authorized purpose, the Grant Coordinator or equivalent at the recipient department shall request disposition instructions from the grantor and follow County policy and procedures for property and inventory control. All disposition requirements will be coordinated with the Grants and Contracts Manager.
5. Grant purchased equipment and real property acquired with federal funds must also comply with 2 CFR 200.313, 200.314 and 200.329 UNIFORM ADMINISTRATIVE REQUIREMENTS, COST PRINCIPLES AND AUDIT REQUIREMENTS FOR FEDERAL AWARDS.

Expenditure Monitoring/Award Reconciliation

It is critical to the overall success of a project that grant funds are expended accurately. After initial setup, grant awards should be reconciled on a monthly basis to ensure:

1. Expenditures are allowable, allocable, necessary, and reasonable based on terms and conditions of the grant award.
2. Expenditures are adequately supported by documentation.
3. Evaluation for a budget revision or amendment is assessed. Requests to Grantor agencies for budget revisions or amendments need to be made in writing with the grantor agency approval also in writing.
4. Expenditures are recorded and charged to the correct project and/or general ledger account in EDEN.
5. Award spending is commensurate with the project timeframe.

Reconciliation involves checking expenditures/revenues recorded in Project Accounting to those recorded in General Ledger; and checking revenues billed during a reporting/billing period against expenditures charged to the project during the same period.

Cost Transfers

Incorrectly posted charges to grant funded projects must be fixed within regulated time-constraints, which is why routine account reconciliation is critical. Failure to transfer incorrectly posted charges in a timely manner may result in the expense being disallowed for grant reimbursement.

1. All cost transfers moving an expenditure from one grant funded project to another grant funded project should be made within 90 days from the end of the calendar month in which the transaction appears.
2. Any cost transfer removing expenses from a grant funded project to a non-grant funded project may be made without regard to a time limit.



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Cost Sharing/Matching

1. The source of cost share must be identified at award setup and tracked for reporting.
2. Cost sharing (a.k.a. matching) is provided either through cash or expenditures, in-kind services, or via a third-party commitment. For federally funded grant awards, all cost sharing/match must be in accordance with 2 CFR 200.306. Revisions and updates to 2 CFR 200 can be found at www.ecfr.gov.

According to 2 CFR 200.306 for all federal awards, any shared costs or matching funds and all contributions, including cash and third-party in-kind contributions, must be accepted as part of the County's cost sharing or matching when such contributions meet all of the following criteria:

- a. Are verifiable from the County's records;
- b. Are not included as match/contributions for any other Federal award (unless expressly authorized by the Federal agency);
- c. Are necessary and reasonable for accomplishment of project or program objectives;
- d. Are allowable under the Cost Principles of 2 CFR 200;
- e. Are not paid by the Federal Government under another Federal award, except where the Federal statute authorizing a program specifically provides that Federal funds made available for such program can be applied to matching or cost sharing requirements of other Federal programs;
- f. Are provided for in the approved budget when required by the Federal awarding agency.

Earned Program Income

Some grant programs contain tasks or objectives that may result in program income. It is important that program income be anticipated and disclosed in the grant proposal budget, which should include a plan for utilization that identifies the method of use. The plan should also include use of income collected in excess of expenditures. If program income is not disclosed at the proposal stage, the grantor must be promptly notified that the project will generate income and determine how income is to be used.

Typically, program income could come from fees collected for services performed or registration fees for conferences or workshops. Such fees can also be generated through sub awardees and must be accounted for in the same manner. Government revenues such as taxes, special assessments, levies, fines, Interest gained on bank accounts and other such revenues raised by the county or sub awardee is not considered program income unless the revenues are specifically identified in the Federal award or Federal awarding agency regulations as program income.



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Program income may be used for a project in several ways depending upon the grantor agency's requirements:

- Additive: Program income is added to funds committed to the project by the grantor and used to fulfill eligible project or program objectives.
- Cost Share: Program income is used to finance a share of the project or program.
- Deductive: Program income is deducted from the total project or program budget.

If the grantor agency does not specify in its regulations or the terms and conditions of the award or give prior approval for how program income is to be used, program income must be deducted from total allowable costs to determine the net allowable costs. Program income that the County did not anticipate at the time of the grantor award must be used to reduce the grantor award and the County match (if applicable) rather than to increase the funds committed to the project.

All program income must be accounted for during the performance period of the award and be reported per the method of utilization approved by the grantor. Failure to disclose program income may require that all program generated income be treated as Deductive.

Use of program generated income resulting from a federal grant funded project/program shall comply with 2 CFR 200.307.

Support of Salaries and Wages

Compensation for personnel services on federal grants must be based on payrolls documented through standard County policy and procedures. The consequences of noncompliance with employee time and effort certification may be the disallowance of such charges to the grant. Federal grants require accounting for 100% of one's time even if all of one's time is not allocated to the grant project (2 CFR 200.430). The Project Accounting module is used to capture costs of grants and capital projects.

Salaries and wages of employees used in meeting cost sharing or matching requirements of federal awards must be supported in the same manner as those claimed as allowable costs under federal awards. The consequences of noncompliance with employee time and effort certification may be the disallowance of such charges to the grant.

Where an employee works on single or multiple awards (including federal and non-federal), a distribution of their salaries/wages and fringe benefits must be supported by a personnel activity report that:

- a. Reflects an after-the fact distribution of the actual activity of the employee.
- b. Accounts for total compensated activities.
- c. Be prepared at least monthly and coincide with one or more pay periods.



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- d. Must be signed by the employee or supervisor *who has first-hand knowledge of the work performed by the employee.*
- e. Or any other format accepted or deemed acceptable by the granting agency.

GRANT REPORTING

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

Types of Reports

- Performance/Progress/Narrative/Status: The recipient department's Grant Coordinator is required to regularly submit to the grantor and retain performance reports that reflect grant-funded operational progress as required by the grant agreement.
- Financial: The Fiscal Contact is required to regularly submit and retain financial reports that reflect a grants fiscal health as required by the grant agreement and supporting documents.
- Close-Out: Dependent upon the conditions of the grant contract, after the expiration or termination of the grant, the Grant Coordinator in collaboration with the Fiscal Contact is required to submit all financial, performance, and other reports required in the grant conditions.

Frequency of Reports

The frequency of the reports is specified in the grant agreement. Occasionally the funding agency requests an interim report. For federal grants, 2 CFR 200.328 requires submission of an interim report when significant developments have occurred. This is defined as problems, adverse conditions or changes in timelines (either favorable or unfavorable).

It is ultimately the responsibility of the recipient department to be sure reports are submitted by deadline. The Grant Coordinator is responsible for completing reports in a timely manner and for the report submission to the grantor. The Grant Coordinator and/or Fiscal Contact may submit the documents to the grantor, depending upon the level of service for the recipient department and the type of report involved. If the agreement does not specify the reporting period, the Grant Coordinator must determine from the funding entity the timeframe for report submission.

GENERAL STANDARDS FOR SUPPORTING DOCUMENTATION



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Costs claimed by the County under its grants must be allowable, allocable and reasonable, and must have adequate documentation to support charges to the grant. Expenditures under most cost reimbursement grants are governed by the cost principles established by federal, state, and other grantors and must conform to respective policies, grant special provisions and County policies.

1. Typical grant transactions may include personnel costs, purchase of equipment and supplies, costs for contracted services, grant income or revenue, etc. Grantees must submit documentation of eligible expenses and proof of payment for expenses incurred during the reporting period.
2. Documentation of eligible expenses may include copies of invoices, receipts, payroll or labor reports, or other proof that complies with federal and state audit standards. Proof of payment of expenditures may include a copy of a credit card receipt, receipt showing cash payment, cancelled checks, bank statements, or other proof that complies with federal and state audit standards. A supplemental accounting record may accompany the receipts and cancelled checks.

FILE MANAGEMENT, ACCESS AND RETENTION

GrantTracking Site Management and Storage

The County uses the GrantTracking Site for document management and storage of all grant-related documents. Important documents that chronicle the application, receipt of award, and all management related documents and correspondence through award closeout should be stored on the GrantTracking Site. Refer to the Grant Coordinator and Fiscal Contact roles in Chapter 3 for the list of responsibilities. The following sections should be looked at as a tool for departments indicating the types of related documents to keep and a recommended file structure that captures the essential elements of your proposals and awards, unless otherwise directed by the grantor:

- a. Proposal Submission
 - Proposal guidelines and supporting legislation
 - Grant Pre-Application Risk Assessment Form (RAF)
 - Grant Checklist
 - Board application approval or designated authority document
 - Signed grant application or submitted copy for web-based applications
 - Information used in the preparation and support of the grant proposal
 - Correspondence related to the grant proposal
- b. Award
 - Grant award letter or contract with budget and special conditions
 - Board Approval for acceptance or designated authority document



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- Grant amendments, amendments, extensions, cancellations and terminations and correspondence related to the award
- c. Financial and Budget
 - Purchase orders
 - Invoices
 - Grantor approvals for items such as budget reallocation, changes to scope, procurement and contractor/vendor selection
 - Personnel time and effort worksheets
 - Reconciliation of allowable expenditures, including reports or adjustments made in Project Accounting
- d. Reports
 - All reports to grantor – performance, progress, status, financial, quarterly, annual, final, etc.
 - Evaluation forms and data
 - Project Closeout documents
 - Monitoring and audit reports
- e. Subrecipient Documents (if applicable)
 - Subrecipient contract
 - All site visit and/or monitoring activity documentation
 - Any subrecipient correspondence
 - Risk assessment
- f. All other pertinent or necessary information to show compliance with the award terms and conditions

Grant Closeout

The grant closeout is a critical piece in the life cycle of a grant. It is the process by which the County performs all necessary administrative and financial actions to satisfactorily complete all requirements set forth in the grant agreement. Preparation for close-out usually begins 60 to 90 days prior to the end date of the grant to accurately forecast expenses and make any adjustments to accounting entries. Generally, the close-out process addresses the physical completion of work, and the administrative and financial requirements for closeout.

Funding Advances from Grantor

Grants are primarily processed as reimbursement by the County unless the funding entity requires funds be advanced, ie (Pre-Award). For grant funding that has been advanced, at the end of the qualified grant period(s) any unexpended investment income, unexpended advances and/or grant revenue in excess of qualified grant expenditures shall be returned to the granting entity or used per written approval from the granting agency. For federal grants, refer to 2 CFR 200.345 to determine how to calculate the amount due to the federal agency. In all



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circumstances, direct communication with the granting entity is recommended to mutually agree upon the calculation for return of funds.

Record Retention and File Maintenance

Records pertinent to a grant award relate to those retained in hard copy and/or electronic formats. Charlotte County follows State guidelines for record retention which is five (5) fiscal years. This exceeds the time required in 2 CFR 200.333 of three (3) years from the date of submission of the final expenditure report; or, for Federal awards that are renewed quarterly or annually, from the date of the submission of the quarterly or annual financial report, as reported to the Federal awarding agency or pass-through entity in the case of a subrecipient. For non-federal grants, follow the file retention guidelines provided in the grant agreement with the granting agency.

If any litigation, claim, negotiation, audit, or other action involving grant records has been started before the expiration of the five-year period, the records must be retained until completion of the action and resolution of all issues which arise from it, or until the end of the regular five-year period, whichever is later.

1. Files for State grants must be retained for a minimum of five fiscal years. Retention requirements for other grants vary by granting entity. **Recipient departments must ensure they comply with retention requirements specified by each grantor.**
2. Retention requirements extend to books of original entry, source documents supporting accounting transactions, the general ledger, subsidiary ledgers, personnel and payroll records, cancelled checks, and related documents and records.
3. Source documents include copies of all awards, applications, and required recipient financial and narrative reports. Personnel and payroll records shall include the time and attendance reports, personal activity reports or equivalent documentation for all individuals reimbursed under the award.
4. Once the mandatory retention period has lapsed, the holder (recipient department and Fiscal Services) shall request that the grant record be properly destroyed in accordance with County Records Management Policy 2.08.

Personally Identifiable Information



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Federally funded grant records must also comply with 2 CFR 220.82 which requires safeguarding data records against unauthorized alterations including Personally Identifiable Information (PII) as specified in [Exhibit 7](#). PII is defined to include a person's name in combination with information such as a social security number, passport number, credit card number, bank number, health records, and similar information. PII required to be disclosed by law is excluded.

GRANT AMENDMENTS, EXTENSIONS, OR CANCELLATIONS

During the course of a grant's lifetime, there are times when changes are necessary to either the budget or the project scope-of-work. Most of these changes, typically called grant amendments, are allowable, but it is important to follow the procedures written in the grant agreement or in the guides provided by the grantor. These changes must be pre-approved by the grantor agency before they are considered eligible. Documentation on all requests and amendment approvals should be stored on [GrantTracking Site](#).

Grant Amendments

1. Written confirmation from the grantor before any money is spent on items different from what was approved in the original budget. Also, project activities that deviate from those originally proposed in the grant application shall be documented and receive prior approval from the grantor before instituting these changes.
2. Budget amendments or similar documentation affecting the grant budget shall be entered into the EDEN project module and [GrantTracking Site](#) for proper tracking. If additional funding is provided by the grantor agency, a budget amendment resolution must be approved by the Board of County Commissioners.
3. Any amendments to the Grant Agreement must be reviewed and approved by Legal pursuant to the Legal Services Request (LSR) process.

Time Extensions

1. Some grants allow for at least one no-cost time extension to complete a project, if necessary. These requests must be documented and written approval must be received from the grantor, usually in the form of a grant amendment/modification.
2. Subrecipient contract extensions may have to go through the Board for approval. The department should contact the County Attorney's office for guidance on its specific subrecipient contract(s).

Cancellations

In the event a grant must be terminated before the original completion date or returned to the grantor prior to project initiation, standard practices for closing out a grant will be completed. In



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each of these cases, the initiating department should first contact the Grants and Contracts Manager to discuss the impact on future funding from the grantor agency.

CHAPTER 7: GRANT SUBCONTRACTING AND SUBRECIPIENT MONITORING

The County will regularly encounter situations where it does not have the workforce capacity to adequately fulfill all of the grant objectives and must seek out other entities to perform certain functions. These activities will be obligated in the form of a subcontract or subaward. In addition, during the course of the grant award, certain materials and supplies and equipment may be purchased through various contractors.

In instances where federal funds are expended, it is important that subrecipients and contractors be defined accurately, as there are specific requirements the County must comply with based on the designation as provided in 2 CFR 200.330. Accurate classification of subrecipients and contractors is critical to a program's success and integrity.

SUBRECIPIENT

Subrecipients. A subaward is for the purpose of carrying out a portion of a Federal award and creates a Federal assistance relationship with the subrecipient. Characteristics which support the classification of the non-Federal entity as a subrecipient include when the non-Federal entity:

- a. Receiving entity determines who is eligible to receive financial assistance.
- b. Has its performance measured in relation to whether objectives of a Federal program were met.
- c. Has responsibility for programmatic decision making.
- d. Is responsible for adherence to applicable Federal program requirements specified in the Federal award.
- e. In accordance with its agreement, uses the Federal funds to carry out a program for a public purpose specified in authorizing statute, as opposed to providing goods or services for the benefit of the pass-through entity.

CONTRACTOR

Contractors. A contract is for the purpose of obtaining goods and services for the non-Federal entity's own use and creates a procurement relationship with the contractor as specified in 2 CFR 200.22. Characteristics indicative of a procurement relationship between the non-Federal entity and a contractor are when the contractor:

- a. Provides the goods and services within normal business operations.
- b. Provides similar goods or services to many different purchasers.



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- c. Normally operates in a competitive environment.
- d. Provides goods or services that are ancillary to the operation of the Federal program.
- e. Is not subject to compliance requirements of the Federal program as a result of the agreement, though similar requirements may apply for other reasons.

In determining whether an agreement between the County and another non-Federal entity casts the latter as a subrecipient or a contractor, the substance of the relationship is more important than the form of the agreement. All of the characteristics listed above may not be present in all cases, and the County must use judgment in classifying each agreement as a subaward or a procurement contract.

SUBAWARDS

Subaward contracts to subrecipients will include the following information:

1. Federal Award Identification
 - a. Subrecipient name;
 - b. Subrecipient unique entity identifier;
 - c. Federal Award Identification Number (FAIN);
 - d. Federal Award Date of award to Charlotte County by the Federal Agency or pass-through entity;
 - e. Subaward Period of Performance Start and End Date;
 - f. Amount of Federal Funds Obligated by the current contract from Charlotte County to the subrecipient;
 - g. Total Amount of Federal Funds Obligated to the subrecipient by Charlotte County including current obligation;
 - h. Federal award project description, as required to be responsive to the Federal Funding Accountability and Transparency Act (FFATA);
 - i. Name of Federal awarding agency, pass-through entity, and contact information for awarding official of the pass-through entity;
 - j. Assistance Listing (formerly CFDA) Number and Name;
 - k. Identification of whether the award is R&D; and
 - l. Indirect cost rate for the Federal award (including if the de minimis rate is charged per 2 CFR 200.414).
2. Requirements imposed by Charlotte County on the subrecipient so that the Federal award is issued in accordance with Federal statutes, regulations and the terms and conditions of the Federal award;
3. Any additional requirements that Charlotte County imposes in order for the subrecipient to meet its own responsibility to the Federal awarding agency including identification of any required financial and performance reports;
4. An approved federally recognized indirect cost rate negotiated between the subrecipient and the Federal Government or, if no such rate exists, either a rate



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negotiated between Charlotte County and the subrecipient (in compliance with 2CFR200.331), or a de minimis indirect cost rate as defined in 2CFR200.414 Indirect (F&A) costs;

5. A requirement that the subrecipient permit Charlotte County and auditors to have access to the subrecipient's records and financial statements as necessary for Charlotte County to meet the requirements of 2 CFR 200.331; and
6. Appropriate terms and conditions concerning closeout of the subaward.
7. All subaward contracts must be reviewed and approved by the County Attorney's Office.

All Legal Service Requests for the review and/or preparation of subaward contracts shall clearly identify that the contract is a subaward; provide a copy of the original Grant agreement including all terms and conditions and provide all the information in subsections a. through l., above, and specify any special conditions.

Subrecipient Risk Assessment

Charlotte County shall evaluate each subrecipient's risk of noncompliance with Federal statutes, regulations, and the terms and conditions of the subaward for purposes of determining the appropriate subrecipient monitoring as identified in 2 CFR 200.331, which may include consideration of such factors as:

1. The subrecipient's prior experience with the same or similar subawards;
2. The results of previous audits including whether or not the subrecipient receives a Single Audit in accordance with 2 CFR 200 Subpart F – Audit Requirements, and the extent to which the same or similar subaward has been audited as a major program;
3. Whether the subrecipient has new personnel or new or substantially changed systems; and
4. The extent and results of Federal awarding agency monitoring (i.e. if the subrecipient also receives Federal awards directly from a Federal awarding agency).

Special Subaward Conditions

Charlotte County may impose specific subaward conditions upon the subrecipient based upon the evaluation of risks as described below:

1. When a subrecipient has a history of failure to comply with the general or specific terms and conditions of a Federal award;
2. When the subrecipient fails to meet expected performance goals contained in a Federal award; and
3. When the subrecipient is not otherwise responsible

Additional award conditions may include such items as:

- a. Requiring payments as reimbursements rather than advance payments;



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- b. Withholding authority to proceed to the next phase until receipt of evidence of acceptable performance within a given period of performance;
- c. Requiring additional, more detailed financial reports;
- d. Requiring additional project monitoring;
- e. Requiring the subrecipient to obtain technical or management assistance; or
- f. Establishing additional prior approvals.

In the event that specific subaward conditions are imposed, Charlotte County will notify the subrecipient as to the nature of the additional requirements, the reason why they are being imposed, the nature of the action needed to remove the additional requirement, if applicable, the time allowed for completing the actions if applicable, and the method for requesting reconsideration of the additional requirements imposed.

Charlotte County will promptly remove any specific conditions once the conditions that prompted them have been corrected.

Modifying Subawards (Amendments and Termination)

1. From time to time, circumstances or conditions may require changes to the subrecipient contract. Subject to written approval of the Grantor, changes which are mutually agreed upon by the Grantee and Subgrantee shall be incorporated in written amendments to the grant contract including:
 - a. Period of performance extension (must be made no less than 60 days prior to the end of the period of performance);
 - b. Change in the scope or objective of the activity, project, or program;
 - c. Additional federal funds to complete the activity, project, or program;
 - d. Transfer of funds between direct cost categories or programs, functions or activities if the award exceeds the Simplified Acquisition Threshold (defined at 2 C.F.R. § 34.803) and the cumulative amount of such transfers exceeds 10 percent of the total budget as last approved by the Grantor;
 - e. Sub awarding, transferring or contracting out of any work unless approved in the grant award (does not apply to acquisition of supplies, material, equipment or general support services); and
 - f. Inclusion of costs that require prior approval in accordance with 2 C.F.R. Part 200 – Cost Principles (unless approved in contract).
2. Grantor and Grantee may only terminate grant agreements in accordance with 2 C.F.R. § 200.339 (Termination).



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SUBRECIPIENT MONITORING

Charlotte County will monitor the activities of the subrecipient as necessary to ensure that the subaward is used for authorized purposes, in compliance with Federal statutes, regulations, and the terms and conditions of the subaward; and that the subaward performance goals are achieved. The departmental Grant Coordinator is responsible for subrecipient monitoring. Subrecipient monitoring shall include:

1. Reviewing financial and performance reports required in order to comply with the Federal award;
2. Follow-up to ensure that the subrecipient takes timely and appropriate action on all deficiencies pertaining to the Federal award provided to the subrecipient detected through audits, on-site reviews, and other means; and
3. Issue a management decision for audit findings pertaining to the Federal award provided to the subrecipient.

Charlotte County may use the following monitoring tools to ensure proper accountability and compliance with program requirements and achievement of performance goals:

1. Provide subrecipient with training and technical assistance on program-related matters; and
2. Perform on-site reviews of the subrecipient's program operations.

Based on the results of the subrecipient's audits, on-site reviews or monitoring activities, Charlotte County may consider taking enforcement action against noncompliant subrecipient which may include the following remedies:

1. Temporarily withholding cash payments pending correction of the deficiency;
2. Disallow all or part of the cost of the activity or action not in compliance;
3. Wholly or partly suspend or terminate the Federal award;
4. Initiate suspension or debarment proceedings as authorized under 2 CFR Part 180;
5. Withhold further Federal awards for the project or program; and
6. Take other remedies that may be legally available.

All grant requirements placed upon the County will flow-down to any subrecipient, and it is the prime grantee's responsibility to ensure subaward compliance with the prime grant provisions. All subawards issued under federal grants must contain language requiring subrecipients to fulfill the prime grant requirements.

1. The Grant Coordinator will advise subrecipients of requirements (including but not limited to financial and non-financial reporting) imposed on them by federal laws,



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regulations of the flow-down provisions of the prime contract or grant agreement, and any supplemental County requirements imposed depending on a level of risk determination by the County.

2. The Grant Coordinator, along with applicable County grant-related service personnel, will monitor the subrecipient's use of grant funds and issue a written report summarizing the results and any corrective actions needed on a semi-annual basis.
3. The Grant Coordinator, along with applicable County grant-related service personnel, will ensure that the County receives annual audit reports from any subrecipients required to have an audit in accordance with 2 CFR 200.
4. Upon receipt of an unfavorable audit report from a subrecipient, the Grant Coordinator, along with the Grants and Contracts Manager, will confirm that the subrecipient has taken appropriate and timely corrective action. If a material weakness or other reportable condition exists, monitoring of the subrecipient will be more frequent and management actions will be taken as appropriate.
5. All subawards for which monitoring is mandated shall be reviewed regularly throughout the year, and at a minimum must include:
 - a. Advising subrecipients of all applicable federal laws and regulations, and all appropriate flow-down provisions from the prime agreement
 - b. Routine receipt and review of technical performance/progress reports
 - c. Routine review of expenses-to-budget
 - d. Periodic on-site visits, or regular contact, if necessary
 - e. The option to perform "audits" if necessary
 - f. Review of audit reports filed by subrecipients and any audit findings
 - g. Review of corrective actions cited by subrecipients in response to their audit findings
 - h. Consideration of sanctions on subrecipients in cases of continued inability or unwillingness to have required audits or to correct non-compliant actions

SUBAWARD CLOSEOUT

An integral part of subcontract monitoring is close-out of the subcontract at the end of the project period. In general, a subcontract is closed when all deliverables have been met and the final payment has been made.

PROCUREMENT AND SUSPENSION AND DEBARMENT

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



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2. **It is the responsibility of the department** to ensure that any potential contractor or subcontractor or sub awardee that will be funded through a grant award is not prohibited from receiving federal or state funds due to suspension or debarment. A person or entity debarred or suspended is excluded from federal financial and non-financial assistance and benefits under federal programs and activities. Debarment or suspension of a participant in a program by one agency has government-wide, reciprocal effect.
3. The Grant Coordinator will ensure that the federal Excluded Parties List System (EPLS) site and the state Convicted/Suspended/Discriminatory/Complaints Contractor Lists are checked prior to entering into any contractual relationship or use of services.
 - a. Excluded Parties List System (EPLS): The System for Award Management (SAM) is the official federal system that consolidated the capabilities of CCR/FedReg, ORCA, and EPLS. It is accessed at: [SAM.gov | Home](https://sam.gov) .
 - b. Convicted/Suspended/Discriminatory/Complaints Contractor Lists are accessed at: http://www.dms.myflorida.com/business_operations/state_purchasing/vendor_information/convicted_suspended_discriminatory_complaints_vendor_lists.
 - c. LEIE: The U.S. Department of Health and Human Services Office of Inspector General maintains a list of all excluded individuals and entities called the List of Excluded Individuals and Entities. These individuals and entities are excluded from providing services for federally funded health care programs. It is accessed at: <http://exclusions.oig.hhs.gov/>.



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CHAPTER 8: OTHER IMPORTANT FEDERAL GUIDELINES AND NATIONAL POLICY GUIDANCE

OFFICE OF MANAGEMENT AND BUDGET (OMB) UNIFORM ADMINISTRATIVE REQUIREMENTS, COST PRINCIPLES, AND AUDIT REQUIREMENTS FOR FEDERAL AWARDS

1. 2 CFR Part 200 (also referred to as the Super Circular or Uniform Guidance) contains the most significant changes to occur to federal grants administration in recent history. Effective 12/26/2014, the regulation establishes uniform guidance for all entities receiving and administering federal awards, as well as auditors responsible for auditing federal awards programs. It combines several grant-related federal guides into a single-source document. Specifically, it replaces guidance from the following documents.
 - a. Administrative Guidance. The Super Circular replaces previous guidance found in Circulars A-102 (the common rule), Circular A-110, and Circular A-89.
 - b. Cost Principles. Replaces guidance found in Circulars A-21, A-87, and A-122.
 - c. Audit Requirements. Replaces guidance found in Circulars A-133 and A-50.
2. All Grant Coordinators and Fiscal Contacts must follow the guidelines established in 2 CFR Part 200 when administering federal grants. To reference the most recent version, go to www.ecfr.gov and search under Title 2.
3. Build American – Buy American - BABAA

SAM UEI Unique Entity Identifier NUMBER

The Federal government requires that all applicants for Federal grants, cooperative agreements, and subawards, with the exception of individuals other than sole proprietors, have a Unique Entity Identifier SAM UEI(SAM UEI) number to better identify organizations that are receiving funding under grants and cooperative agreements, and to provide consistent name and address data for electronic grant application systems. SAM UEI is a unique 12 character identifier. Charlotte County's SAM UEI number is **X3RBY2VEDJT3**.

Beginning April 4th, DUNS numbers will no longer be used by the federal government and SAM.gov.

FEDERAL FUNDING ACCOUNTABILITY AND TRANSPARENCY ACT (FFATA)

As of October 1, 2010, all federal grants of \$25,000 and over are subject to the FFATA subaward reporting requirements. Prime awardees are required to upload the subrecipient information in the FFATA Sub-Award Reporting System (FSRS) <https://www.fsr.gov/index>. Subrecipients must maintain an active registration in the System for Award Management (SAM) in order to receive federal funding.



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1. The Grants Coordinator shall notify the Grants and Contracts Manager when a FFATA reporting form is requested by the granting agency.
2. The Grants and Contracts Manager shall complete a FFATA Subaward Reporting Form for all applicable subaward obligations in the amount of \$25,000 or more no later than the 20th of each month following the month that the subaward was executed.
3. The recipient department shall enter the information through the Federal reporting system.
4. Per the Act, a prime awardee must provide:
 - a. The prime awardee SAM UEI number and the SAM UEI number of any sub-awardee(s).
 - b. The names and total compensation of the five most highly compensated officers of a prime or sub-awardee entity, if the entity in the preceding fiscal year: (1) Received 80 percent or more of its annual gross revenues in federal awards and \$25,000,000 or more in annual gross revenues from federal awards; and (2) the public does not have access to this information about the compensation of the senior executives of the entity through periodic reports filed under section 13(a) or 15(d) of the Securities Exchange Act of 1934 (15 U.S.C. §§ 78m(a), 78o(d)) or section 6104 of the Internal Revenue Code of 1986. See § 2(b)(1).

FEDERAL REQUIREMENTS FOR CONSTRUCTION PROJECTS

It is the responsibility of the recipient department to ensure compliance with the following federal requirements involving construction-related projects. Departments should plan accordingly to ensure that adequate time, funding and staffing are available to carry out these additional responsibilities. These requirements shall flow-down to all subcontractors funded through a grant award. Federal grant programs can waive some of these requirements, careful review by the department of all conditions and terms of the grant agreement/contract is needed.

Davis-Bacon Act

The Davis-Bacon Act is a federal law that established the requirement for paying prevailing wages on public works projects. All federal government construction contracts, and most contracts for federally assisted construction over \$2,000, must include provisions for paying on-site workers no less than the locally prevailing wages and benefits paid on similar projects. The Department's assigned Grant Coordinator must provide Purchasing with a copy of the current prevailing wage determination issued by the Department of Labor to be included in the solicitation. The Grant Coordinator will also be responsible for receiving and reviewing weekly certified payrolls from contractors and subcontractors to ensure compliance with the current wage determination. In addition, the Grant Coordinator or authorized Davis Bacon compliance designee will also be required to conduct on-site interviews of workers who are paid under contracts with Davis Bacon requirements.



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Uniform Relocation Assistance Act

The Uniform Relocation Assistance Act (a.k.a. Uniform Act) of 1970 is a federal law that establishes minimum standards for federally funded programs and projects that require the acquisition of real property (real estate) or displace persons from their homes, businesses, or farms. The Uniform Act's protections and assistance apply to the acquisition, rehabilitation, or demolition of real property for federally funded projects.

Build American- Buy American Act

<https://www.whitehouse.gov/wp-content/uploads/2022/04/M-22-11.pdf>

Build American - Buy American Act requires U.S. Government to prefer U.S. made products in its purchases. It does not necessarily mean a product has to be purchased in America. Please refer to the link above.

National Environmental Policy Act (NEPA)

NEPA is a federal law that mandates assessment of the impacts on the environment of construction funded with federal dollars.

American Iron and Steel Act (AIS)

Requires recipients of certain federal funds, including State Revolving Fund (SRF) loans, to use iron and steel products that are produced in the United States for the construction, alteration, maintenance, or repair of a public water system or treatment works.

CONFLICT OF INTEREST

As a part of the grant application process, the grant preparer must positively state on any grant form, when asked, that there is an absence of a financial or other interest or affiliation held by them or a member of their immediate family in the funding agency or in companies from which goods and services will be obtained under the supported activity. For Federally-funded grants, conflict of interest language must be included in the application; and, if a potential conflict of interest is identified during grant administration, the Grant Coordinator must disclose the potential conflict, in a timely manner, in writing, to the applicable Federal agency or pass-through entity.

In general, two types of conflict of interest must be considered:

1. Employee Conflict of Interest. No employee, officer, or agent must participate in the selection, award, or administration of a contract supported by a Federal award if he or she has a real or apparent conflict of interest. Such a conflict of interest would arise when the employee, officer, or agent, any member of his or her immediate family, his or her



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partner, or an organization which employs or is about to employ any of the parties indicated herein, has a financial or other interest in or a tangible personal benefit from a firm considered for a contract. The officers, employees, and agents of the non-Federal entity must neither solicit nor accept gratuities, favors, or anything of monetary value from contractors or parties to subcontracts. However, non-Federal entities may set standards for situations in which the financial interest is not substantial or the gift is an unsolicited item of nominal value. Monetary, administrative, and/or loss of grant funds are disciplinary actions that may be applied for violations of such standards by officers, employees, or agents of the non-Federal entity.

2. Organizational Conflict of Interest. Organizational conflict of interest means that because of relationships with a parent company, affiliate, or subsidiary organization, the non-Federal entity is unable or appears to be unable to be impartial in conducting a procurement action involving the related organization.

Should there be an employee or organizational conflict of interest within the County, the initiating department shall disclose, in writing, to the federal awarding agency or pass-through entity in accordance with applicable federal awarding policy. See Conflict of Interest policies in Exhibit 8.

LOBBYING

The cost of certain influencing activities associated with obtaining grants, contracts, cooperative agreements, or loans is an unallowable cost. Departments seeking federal funds for projects must disclose the lobbying activities. Use Federal form SF-LLL Disclosure of Lobbying Activities when applying for Federal funding. See Lobbying Restrictions policy and Lobbyist Disclosure Procedures in Exhibit 9.

NATIONAL POLICY REQUIREMENTS

County staff shall adhere to National Policy Requirements affecting grants. It is also the responsibility of Grant Coordinator to ensure that subgrantees adhere to applicable policies. A sample of the policies are provided below but, are not intended to be all-inclusive.

Civil Rights

Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d, et seq. and its implementing regulations provide that no person shall be subjected to discrimination on the basis of race, color, or national origin under any program or activity that receives federal financial assistance. In most cases, when a recipient receives Federal financial assistance for a particular program or activity, all operations of the recipient are covered by Title VI, not just the part of the program that uses the Federal assistance.



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Equal Services Provider

Charlotte County is an equal employment and services provider. All grant decisions are based on merit and program need, and not on race, color, citizenship status, national origin, ancestry, gender, sexual orientation, age, weight, religion, creed, physical or mental disability, marital status, veteran status, political affiliation or any other factor protected by law.

Limited English Proficiency (LEP)

Language for LEP individuals can be a barrier to accessing important benefits or services, understanding and exercising important rights, complying with applicable responsibilities, or understanding other information provided by federally funded programs and activities. Title VI and Title VI regulations require that recipients take reasonable steps to ensure meaningful access to the information, programs, and services they provide. For more information, please refer to Charlotte County Administrative Code 3.03 TITLE VI – NONDISCRIMINATION under Limited English Proficiency Guidance.

[title-VI-nondiscrimination-06-22-2021.pdf \(charlottecountyfl.gov\)](https://www.charlottecountyfl.gov/department/human-resources/american-with-disabilities-act.html)

American with Disabilities Act (ADA)

In the broadest sense, it requires that state and local governments be accessible to people with disabilities. The Charlotte County Board of County Commissioners will not discriminate against qualified individuals with disabilities on the basis of disability in the provision of services, programs or activities. For more information on Charlotte County's obligations under the ADA Act and to obtain a copy of Charlotte County's Grievance Procedure visit <https://www.charlottecountyfl.gov/departments/human-resources/americans-with-disabilities-act.shtml>.

OCCURRENCES REQUIRING IMMEDIATE NOTIFICATION

Key Personnel Changes

Promptly notify the grantor agency, Fiscal Services Grants Section and the Grants and Contracts Manager upon the resignation, termination, or retirement of any Grant Coordinator or other key grant program staff member to ensure that proper retention of information and continuous grants management occurs during the transition period. Grantor approval is required to modify key grant personnel.

Notice of Audit, Monitoring Visit or Review



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Promptly notify the Fiscal Services Grants Section and the Grants and Contracts Manager upon receipt of a notice by the recipient department of a site or monitoring visit to be performed by the grantor. Fiscal Services Grants Section staff may assist in the preparation of grantor site visits, reviews, or audits.

EXTERNAL AUDITS

The Board engages independent auditor(s) to review the County's financial reports and grant reports for compliance and deficiencies. These auditors are managed by the Clerk's Finance Division and annually review the CAFR (Comprehensive Annual Financial Report) and SEFA (Schedule of Expenditure of Federal Awards).

Federal Single Audit Act

Federal audit and annual reporting requirements are contained in 2 CFR Part 200 Subpart F (200.5 Compliance and Audit Requirements.) Non-federal entities expending \$750,000 or more in a year in federal awards are required to have a single or program-specific audit conducted for that year, performed by an outside auditor. It is important that all grant activity and any changes to the grant are well documented to facilitate any audit. Audit findings made during the audit are provided to the grantor, which could prompt an audit by the grantor.

The following activities are the fourteen types of compliance requirements considered in every audit conducted under 2 CFR Part 200 Subpart F, and are found highlighted throughout this manual:

1. Activities: Allowed or Unallowable
2. Allowable Costs/Cost Principles
3. Cash Management
4. Compliance with Terms & Conditions (e.g. Davis-Bacon Act)
5. Eligibility
6. Equipment and Real Property Management
7. Matching, Level of Effort, Earmarking
8. Period of Availability of Federal Funds
9. Procurement, Suspension and Debarment
10. Program Income
11. Real Property Acquisition and Relocation Assistance
12. Reporting
13. Subrecipient Monitoring
14. Special Tests and Provisions

Florida Single Audit Act



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The Florida Single Audit Act establishes uniform audit requirements for state financial assistance, and follows the same cost principles and requirements established in the Federal Single Audit Act, but at a \$750,000 threshold.

Granting Agency or Pass-Through Agency Audits

Each grantor and/or pass-through agency may have different terms they use when conducting reviews of programs they fund. However, no matter the term used, the agency is reviewing documentation that substantiates whether the County is in compliance with the terms and agreements associated with the specific grant or subaward. These reviews are usually more programmatic in nature although the associated fiscal monitoring can be more detailed. The fiscal monitoring is usually more specific than the single audit in that the reviewing agency requests a number of individual client files and all related programmatic and fiscal documentation to determine allowable services as well as costs.

INTERNAL AUDITS

County Audit

The Clerk of the Circuit Court established and maintains the Internal Audit Division. The Division audits operations of the Board of County Commissioners and the Clerk of the Circuit Court. To function properly, auditors must be independent of the activities they audit. Such independence permits auditors to perform their work freely and objectively. The Clerk of the Circuit Court, as an elected official, is independent of the Board of County Commissioners.

Internal auditing is an independent appraisal activity that evaluates whether management has effectively and efficiently carried out its responsibilities. The Division provides independent, objective and unbiased assessments of Charlotte County government practices. The Division applies a systematic and disciplined approach to evaluating Charlotte County government operational, compliance, and fiscal risks; examines management control practices; and assesses strategic business governance activities. Through this evaluation activity, recommendations are made to improve operations in a written report.

The scope of the Division includes any operation under the direction of the Clerk of the Circuit Court or the Board of County Commissioners. It also includes other functions for which the Board of County Commissioners provides financial support as separate entities in its budget or of which the Board of County Commissioners is the ex-officio governing body. The Director of Internal Audit reports directly to the Clerk, thereby giving the Division the independence to objectively appraise operations of the Board and the Clerk's Office.



Grants Administration Manual

EXHIBITS

Exhibit 1: Grant Pre-Application Risk Assessment Form



Charlotte County
Grant Pre-Application Risk Assessment Form

Application Deadline to Agency:	Date:
Contact for Application:	Department:
Title:	Phone Number:

List staff that will be assigned to work with grant if awarded:

Grant Coordinator:	Fiscal Contact:
Title:	Title:
Department:	Department:

Funding and Programmatic Analysis:

Grant Program Name:			
General Purpose of Grant:			
Awarding Agency:	Federal pass-through? <input type="checkbox"/> Yes <input type="checkbox"/> No If YES, identify federal source:		
Amount of grant funding:	Multi-year:	Year 1	Year 2 Year 3
Proposed award period of performance (m/d/yy): FROM THROUGH			
Special Requirements or Conditions: (i.e. legal requirements, prohibitions, etc.)			
Where will funds be budgeted? <input type="checkbox"/> Capital <input type="checkbox"/> Operating			
Cost share/match requirements? <input type="checkbox"/> Yes <input type="checkbox"/> No		If yes, amount or percentage:	
Identify type and source(s) of cost share/match (i.e. cash, in-kind, donation, other) Type and Source(s):			

Reporting Frequency	Programmatic:	Financial:
Estimated staff time required for application and during grant period:	Programmatic:	Financial:
List job title(s) and quantity		

Has the County received this grant before? <input type="checkbox"/> Yes <input type="checkbox"/> No	If yes, number of years:
If yes, list any changes in reporting or program requirements:	
Will this grant project be part of an existing or new Capital Improvement Project? <input type="checkbox"/> Yes <input type="checkbox"/> No	
If yes, CIP Project Name:	
Describe any program income considerations:	



Grants Administration Manual

Exhibit 1: Grant Pre-Application Risk Assessment Form (continued)



Charlotte County Grant Pre-Application Risk Assessment Form

Does application involve purchasing land, facilities, or equipment individually valued over \$5,000? Yes No
List:

List any future costs related to grant project including maintenance, on-going contractual costs, replacement costs, or any other operating costs.

Estimated annual recurring costs:

Does grant fund any staff positions? Yes No If yes, list position(s) and quantity:

Are administrative fees allowed? Yes No If yes, maximum allowed:

Are indirect costs allowed? Yes No

If yes, County has elected to use the de minimis indirect cost rate of 10% for federal grant awards.

List any restrictions:

Amount of administrative fees or indirect costs included in this grant proposal:

Does application involve County being a pass-through entity to a subrecipient(s)? Yes No

Describe staff knowledge (or planned training) on programmatic requirements, and any applicable subrecipient monitoring for the grant:

Does grant project require partner agency participation (MOU)? Yes No

Describe how the grant aligns with the strategic priorities of the County:

Describe how the grant aligns with the Department's mission and goals:

Document the need for this project/service. Is there possible duplicative services are already in the community?

Describe the sustainability/program continuation after grant period ends:

Signatures for Review:

Department Director	Fiscal Services	Grant Compliance
Date:	Date:	Date:



Grants Administration Manual

Exhibit 2: Grant Checklist



Charlotte County Grant Checklist

Department:

Staff Completing Form:

Grant Program Name:

Instructions:

- Departments to attach to Agenda Item when applying or accepting a grant.
- Fill out one form for each grant.
- Contact a Fiscal Services Grant Representative with any questions.

1. How much funding will the Department/County receive from the grant?
2. Is there a County match required? If yes, identify type and source.
3. How many years have we been receiving this grant?
4. What will the grant be used for?
5. Is it for additional or new services/equipment/facilities?
6. Does it pay for something that the County already does?
7. Does it pay for any positions? If yes, what happens to the position(s) if the grant goes away?
8. Is the County obligated to pay for anything after the grant goes away?



Grants Administration Manual

Exhibit 3: Legistar Agenda Item (Approval to Apply)



Charlotte County

Commission Chambers,
Room 119
18500 Murdock Circle
Port Charlotte, FL 33948
CharlotteCountyFL.gov

Agenda Item Summary

File #: 202X-XXXX

Agenda Date:

Agenda Item #: X.

DEPARTMENT MAKING REQUEST

Department Name

Title

Title of Agenda Item (reference grant name)

REQUESTED MOTION/ACTION

Recommended Action:

- a) Ask approval and authorization for Chair to sign application, identify grant program and granting agency, amount of the grant, and a brief caption of what it will be used for; and
- b) Approval for the County Resolution applicable to the grant program, if needed; and
- c) May ask to authorize the County Administrator, or his designee, to execute amendments and any other documentation related to the Agreement.

Budgeted
Action: to be completed by Fiscal Services

Budgeted Action:

State whether action is needed. State if a budget amendment will be returned to the Board once a Notification of Funding is received. Always state whether a local match is required or it will be 100% reimbursable and no local match is required by the County. State grant application amount and identify where the funding will come from, and where any required match will be provided from and budgeted in.

BACKGROUND (Why is this Action Necessary, and What Action will be accomplished)

Background:

- Describe the grant project
- Identify funding method, whether it is a reimbursement grant or advanced funding
- Identify if a Federal or State grant or pass-through
- Identify whether it is a formula or competitive grant
- Identify match, include amount and type (i.e. cash, in-kind, etc.)
- If new positions or retained positions are a component, identify how many, full-time or part-time, job title, and requirements after grant period is over
- Include any on-going costs or any requirements that the County has to fund to receive this grant
- Obtain approval to move forward on the project
- Include any pertinent backup with agenda item (i.e. detailed project description, maps, cost benefit analysis, etc.)

Attachments:

- Grant Checklist Form
- Grant Application
- Resolution, if applicable
- Supporting Documents



Grants Administration Manual

Exhibit 4: Legistar Agenda Item (Approval to Accept)



Charlotte County

Commission Chambers,
Room 119
18500 Murdock Circle
Port Charlotte, FL 33948
CharlotteCountyFL.gov

Agenda Item Summary

File #: 202X-XXXX Agenda Date: Agenda Item #: X.

DEPARTMENT MAKING REQUEST

Department Name

Title

Title of Agenda Item (reference grant name)

REQUESTED MOTION/ACTION

Recommended Action:

- a) Ask approval and authorization for Chair to accept grant award, identify grant program and granting agency, amount of the grant, and a brief caption of what it will be used for; and
- b) Approval for the County Resolution authorizing budget amendment # in the amount of \$, if needed; and
- c) May ask to authorize the County Administrator, or his designee, to execute amendments and any other documentation related to the Agreement.

Budgeted Action:

State whether action is needed. Approve budget amendment # in the amount of \$; or if no action is needed due to the grant being budgeted in the FYXX budget process. Always state whether a local match is required or it will be 100% reimbursable and no local match is required by the County. State grant application amount and identify where the funding will come from, and where any required match will be provided from and budgeted in.

BACKGROUND (Why is this Action Necessary, and What Action will be accomplished)

Background:

- Describe the grant project
- Identify funding method, whether it is a reimbursement grant or advanced funding
- Identify if a Federal or State grant or pass-through
- Identify whether it is a formula or competitive grant
- Identify match, include amount and type(i.e. cash, in-kind, etc.)
- If new positions or retained positions are a component, identify how many, full-time or part-time, job title, and requirements after grant period is over
- Include any on-going costs or any requirements that the County has to fund to receive this grant
- Obtain approval to move forward on the project
- Include any pertinent backup with agenda item (i.e. detailed project description, maps, cost benefit analysis, etc.)

Attachments:

- Grant Checklist Form
- Grant Award letter or Agreement
- Budget Adjustment or Budget Resolution, if applicable
- Supporting Documents

**Budgeted
Action: to
be completed
by Fiscal
Services**



Grants Administration Manual

Exhibit 5: Grant Administrative Approval Form

Charlotte County Grant Administrative Approval			
Department Making Request: 	Grant Coordinator Assigned: <u> </u> Fiscal Contact Assigned: 		
Requested Action: 			
Is this item budgeted? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Budget Action: 			
Background: (Why is the Action Necessary, and What Action will be accomplished) 			
Grant Checklist Attached? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Risk Assessment Attached? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Delegation Resolution Attached? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No			
Signatures: County Administrator _____ Date: _____			
Department Director	Fiscal Services	County Attorney	Grant Compliance
Date: _____	Date: _____	Date: _____	Date: _____



Grants Administration Manual

Exhibit 6: County Grants Management Policy 4.05

CHARLOTTE COUNTY GOVERNMENT
BOARD OF COUNTY COMMISSIONERS

ADMINISTRATIVE CODE
4.00 COUNTY ADMINISTRATION

4.05 COUNTY GRANTS MANAGEMENT	
ORIGINATING DEPARTMENT: Administration	ADOPTED: March 14, 2017
<p>PURPOSE:</p> <ol style="list-style-type: none"> To ensure state and federal grants and pass-through grants further core county functions, provide for activities and assets that are in the best interest of the county, and are administered under a uniform grants administration program under the direction of the county administrator or his or her designee; and To ensure state and federal grants are administered in accordance with best management practices and with requirements of the state and federal law, as applicable, including the Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards ("the Uniform Guidance"), 2 C.F.R. Part 200, effective Dec. 26, 2014, and all related state and federal statutes, rules, regulations and guidance documents governing the administration of state and federal awards and pass-through awards. <p>PROCEDURE:</p> <p>The county will maintain a Grants Administration Manual that sets forth county procedures for administering state and federal awards and pass-through awards in keeping with the requirements of the state and federal law. The provisions of the Grants Administration Manual are applicable to all county officers and employees under the control of the Board of County Commissioners, and to agents, contractors and sub-grantees who perform functions associated with any state or federal award or pass-through award.</p> <p>The county administrator will designate a grants program manager who will be responsible for organizational oversight of the county's grants management program consistent with this policy and the Grants Administration Manual, and for ensuring all specific grant-related compliance obligations are met. Grants coordinators in each department are responsible for day to day compliance activities pertaining to grants that they oversee, under the oversight of the grants program manager.</p> <p>The county administrator may amend the Grants Administration Manual from time to time as may be necessary to ensure compliance with state and federal law and with changing operational needs of the county.</p>	
SCHEDULED REVIEW DATE: Annually	AMENDED: September 22, 2020



Grants Administration Manual

Exhibit 7: Personally Identifiable Information Policy

PERSONALLY IDENTIFIABLE INFORMATION	
ORIGINATING DEPARTMENT: Administration	ADOPTED:
<p>PURPOSE:</p> <p>Charlotte County is committed to maintaining the confidentiality of Personally Identifiable Information ("PII"), except as may be otherwise required pursuant to Florida law. This policy applies to Charlotte County staff, contractor or service provider staff, sub-grantees or any other person involved in the handling of PII associated with a federal grant or funding agreement.</p> <p>REFERENCES:</p> <ul style="list-style-type: none"> - Uniform Administrative Requirements, Cost Principals, and Audit Requirements for Federal Awards, 2 C.F.R. §200; - Article I, Sec. 24, Constitution of the State of Florida (Access to public records and meetings); and - Chapter 119 of the Florida Statutes (the Florida public records act). <p>POLICY:</p> <p>Charlotte County is the recipient of certain federal grants and cooperative funding agreements and is subject to the Uniform Administrative Requirements, Cost Principals, and Audit Requirements for Federal Awards (the "Uniform Guidance"). Charlotte County is also a public agency of the state of Florida subject to open meeting and records requirements in the Florida Constitution and Florida Statutes.</p> <p>It is the stated policy of Charlotte County to protect PII to the maximum extent allowable pursuant to federal and state law, and to cause contractors, service providers, sub-grantees or other entities providing services to Charlotte County on projects deriving from federal funding to do the same.</p> <p>PROCEDURE:</p> <p>Pursuant to federal law, PII is defined as:</p> <p style="padding-left: 40px;">an individual's first name or first initial and last name in combination with any one or more of types of information, including, but not limited to, social security number, passport number, credit card numbers, clearances, bank numbers, biometrics, date and place of birth, mother's maiden name, criminal, medical and financial records, educational transcripts. This does not include PII that is required by law to be disclosed.</p> <p>2 C.F.R. §200.82.</p>	



Grants Administration Manual

Exhibit 7: Personally Identifiable Information Policy (Continued)

Federal grant agreements contain requirements on the acquiring, handling, transmitting and protecting PII. PII may be contained in paper or electronic formats and the County must mitigate the risks associated with the collection, storage and dissemination of PII.

Notwithstanding, the Florida Constitution and the Florida Public Records Act make all public records, with certain stated exemptions, public records of the state and open to inspection and copying by any member of the public for any purpose.

Most names, passport numbers, dates and places of birth, mother's maiden name, certain criminal records, certain financial records and certain educational records are public records of the state of Florida and must be produced upon request, but are nonetheless sensitive information and should be handled to protect unnecessary use by unauthorized persons.

Social security number, credit card numbers, bank account numbers, biometric information and medical records are exempt from Florida public records production, should be handled with utmost care to protect from unnecessary use by unauthorized persons, and may not be produced pursuant to a public records request.

The following procedures will apply to staff, contractors, service providers, sub-grantees and other persons involved in the handling of PII:

- All parties must ensure that PII used during the performance of the federal grant has been obtained in conformity with applicable federal or state law.
- To ensure that PII is not transmitted to unauthorized persons, all PII and sensitive data transmitted via email or stored electronically must be encrypted using industry-standard information processing standards. Neither County nor any contractors, service providers, sub-grantees or other persons may email unencrypted PII to any entity.
- The County and contractors, service providers, sub-grantees and other persons must ensure that all PII is stored in an area that is physically safe from access by unauthorized persons at all times and the data will be processed using County (or related contractor or service provider) equipment and information technology, at approved designated locations. Personal Electronic Devices will not be used to process PII.
- Records/documents containing PII may not be left open and unattended, will be stored in reasonably secure areas including locked rooms or cabinets, and staff handling PII as part of their official duties will treat such documents as confidential.
- The County and contractors, service providers, sub-grantees and others who have access to PII will be advised of the confidential nature of the PII, the safeguards required to protect the PII and that there are civil and criminal sanctions for noncompliance with such safeguards that are contained in Federal law.
- Contractors, service providers, sub-grantees and others must have policies and procedures in place under which their employees and other personnel acknowledge the confidential nature of PII and the safeguards with which they must comply.
- Contractors and service providers must not extract information from data supplied for any purpose not stated in the grant or funding agreement.



Grants Administration Manual

Exhibit 7: Personally Identifiable Information Policy (Continued)

- Access to PII created by the County must be restricted to only those County employees or employees of contractors, service providers or sub-grantees who need such information to perform duties in their official capacity.
- All PII data must be processed in a manner that will protect the confidentiality of the records/documents and is designed to prevent the unauthorized dissemination of such records/documents by electronic or other means.
- Records/Documents that constitute official public records may be released pursuant to a public records request following procedures outlined in Florida law and County policy.
- Appropriate methods of destroying PII will be used by the County and its contractors or service providers when records are eligible for destruction pursuant to applicable records retention laws and destroyed. Such methods may include shredding, burning, or electronically deleting PII.
- Any breach or suspected breach of PII must be reported to the Grantee immediately.

Failure on the part of the County or its contractors, service providers and sub-grantees to comply with these requirements may result in the termination or suspension of the federal grant or funding agreement, or the imposition of special conditions or restrictions, or other such actions as the federal Grantor may deem necessary to protect the privacy of PII.

SCHEDULED REVIEW DATE:

As needed

AMENDED:



Grants Administration Manual

Exhibit 8: Conflict of Interest for Federal Awards Policy

CONFLICT OF INTEREST POLICY FOR FEDERAL AWARDS	
ORIGINATING DEPARTMENT: Administration	ADOPTED:
<p>PURPOSE:</p> <p>This policy applies to Charlotte County officers (including advisory board members), staff, contractors, agents, sub-grantees or parties to cooperative agreements associated with a federal grant or funding agreement.</p> <p>REFERENCES:</p> <ul style="list-style-type: none"> - 2 C.F.R. §§ 200.112 and 200.113. - Appendix XII to part 200 – Award Term and Condition for Recipient Integrity and Performance Matters (“Appendix XII”), attached. <p>POLICY:</p> <p>Charlotte County, a political subdivision of the state of Florida, is the recipient of certain federal grants and cooperative finding agreements and shall comply with 2 C.F.R. § 200.112 (“Conflict of Interest”) and §200.113 (“Mandatory Disclosures”), and Appendix XII. These provisions require the County to adhere to certain ethical standards in the application and administration of federal funding and to disclose in writing: any potential conflict of interest to the Federal awarding agency or pass-through entity in accordance with applicable Federal awarding agency policy; any violation of Federal criminal law involving fraud, bribery, or gratuity violations potentially affecting the Federal award; and to report certain civil, criminal, or administrative proceedings to SAM pursuant to Appendix XII.</p> <p><u>Conflicts of Interest</u></p> <p>In addition to Human Resources Policy 3.25 (“Conflict of Interest”), which governs the conduct of County employees under Florida law, no employee, officer, or agent of the County may participate in the selection, award, or administration of a contract supported by a Federal award if he or she has a real or apparent conflict of interest. Such a conflict of interest would arise when the employee, officer, or agent, any member of his or her immediate family, his or her partner, or an organization which employs or is about to employ any of the parties indicated above has a financial or other interest in, or a tangible personal benefit from a firm considered for a contract. Except as limited by Policy 3.25 (above), employees, officers and agents of the County may neither solicit nor accept gratuities, favors, or anything of monetary value from contractors or parties to subcontracts associated with any Federal grant or award.</p> <p><u>Disclosure of Conflicts and Violations of Federal Criminal Law</u></p> <p>Any potential conflicts of interest must be disclosed, in a timely manner and in writing, to the Federal awarding or pass-through agency.</p>	



Grants Administration Manual

Exhibit 8: Conflict of Interest for Federal Awards Policy (Continued)

In addition, all violations of Federal criminal law involving fraud, bribery, or gratuity violations potentially affecting the Federal award are prohibited and must be disclosed, in a timely manner and in writing, to the Federal awarding agency.

If the total value of active County grants, cooperative agreements and procurement contracts from all Federal awarding agencies exceeds \$10,000,000 for any period of time during the performance of any Federal award, then the County must report any violations listed in Appendix XII as may be required by the System for Award Management ("SAM") that is made available in the designated integrity and performance system (currently the Federal Awardee Performance and Integrity Information System ("FAPIIS")), about civil, criminal, or administrative proceedings described in Appendix XII.

PROCEDURE:

Disclosure of Conflicts and Violations of Federal Criminal Law

The assigned Grant Coordinator/Project Manager for the federally-funded project, with the assistance of the Grants and Special Projects Manager, is responsible for ensuring compliance with this Policy and for making any and all required disclosures.

Reports must be made semi-annually for the most recent five (5) year period during any period of time the County is subject to the requirements of Appendix XII.

Any officer, employee, agent, contractor or sub-grantee who is aware of violations or suspected violations of any part of the Conflict of Interest (Policy 3.25) or of this Policy that may relate to any Federal award, grant, cooperative agreement or project, must report the same to the Grant Coordinator/Project Manager, any Department Director, the Grants and Special Projects manager, the County Administration or the County Attorney, who will take appropriate action to ensure that this policy is followed, including any required disclosures.

No Retaliation

Any individual who in good faith reports any violation or suspected violation of these policies may not be subject to retaliation of any kind because they have made such a report.

Penalties

Failure to make required disclosures can result the imposition of any remedies for noncompliance found on 2 C.F.R. §200.338, including suspension or debarment.

In addition to the penalties provided above, and the penalties provided in the Florida Statutes, a violation of any provision of the Code of Ethics or of this Policy may subject an employee to disciplinary action up to and including discharge from County employment.

SCHEDULED REVIEW DATE:

As needed

AMENDED:



Grants Administration Manual

Exhibit 9: Lobbying Restrictions Policy

Lobbying Restrictions	
ORIGINATING DEPARTMENT: Administration	ADOPTED:
<p>PURPOSE:</p> <p>This policy applies to Charlotte County staff, contractor or service provider staff, sub-grantees or cooperative agreements associated with federal grants or funding agreements.</p> <p>REFERENCES:</p> <ul style="list-style-type: none"> - 2 C.F.R. § 200.450 - 31 U.S.C. § 1352 <p>POLICY:</p> <p>Charlotte County, a political subdivision of the state of Florida, is the recipient of certain federal grants and cooperative finding agreements and shall comply with 2 C.F.R. § 200.450 ("Lobbying"), which incorporates the provisions of 31 U.S.C. § 1352, the "New Restrictions on Lobbying" published at 55 FR 6736 (February 26, 1990), and OMB guidance and notices on lobbying restrictions. These provisions prohibit the use of Federal funds for lobbying the executive or legislative branches of the Federal Government in connection with the award, and require the disclosure of the use of non-Federal funds for lobbying. Executive lobbying costs, i.e., costs incurred in attempting to improperly influence either directly or indirectly an employee or officer of the executive branch of the Federal government to give consideration or to act regarding a Federal award or a regulatory matter, are unallowable costs.</p> <p>See 2 C.F.R. § 200.450(b) and (c).</p> <p><u>Disclosure of Lobbying Activities</u></p> <p>Any non-Federal entity receiving in excess of \$100,000 in Federal funding shall submit a completed Form SF-LLL or any successor form, "Disclosure of Lobbying Activities," regarding the use of nonfederal funds for lobbying. The Form SF-LLL shall be submitted within 30 days following the end of the calendar quarter in which there occurs any event that requires disclosure or that materially affects the accuracy of the information contained in any disclosure form previously filed. The non-Federal entity must submit any required Forms SF-LLL, including those received from sub-recipients, contractors, and subcontractors, to the Grants Officer. See 31 U.S.C. § 1352.</p> <p>PROCEDURE:</p> <p>Any sub-grantee or cooperative agreement that includes any federal funds shall include the following language in the award/procurement agreement :</p>	



Grants Administration Manual

Exhibit 9: Lobbying Restrictions Policy (Continued)

The undersigned certifies, to the best of his or her knowledge and belief, that:

(1) No Federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement.

(2) If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, the undersigned shall complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions.

(3) The undersigned shall require that the language of this certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all sub-recipients shall certify and disclose accordingly.

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

Statement for Loan Guarantees and Loan Insurance

The undersigned states, to the best of his or her knowledge and belief, that:

If any funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this commitment providing for the United States to insure or guarantee a loan, the undersigned shall complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions.

Submission of this statement is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required statement shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

SCHEDULED REVIEW DATE:
As needed

AMENDED:



Grants Administration Manual

APPENDICES

Glossary

Accounts Receivable: Accounts receivable are costs that are billed to the grantor agency for which the County has not yet received payment.

Allowable/Eligible Cost: An allowable or eligible cost is an expense that can be charged directly to the grantor agreement and is not specifically excluded by government regulations or by the grant agreement.

Application/Offer: An application or offer is a formal request of agency approval for funding of cost objectives based upon the County's project accomplishments.

Authorized Organizational Representative (AOR): The administrative official who on behalf of the County is empowered to make certifications and assurances and can commit the organization to the conduct of a project for which funding is being sought, as well as adhere to various grantor policies and grant requirements. For the County, this person is the County Administrator or his or her designee documented in writing. The AOR has the authority to sign grant applications and the required certifications and/or assurances that are necessary to fulfill the requirements of the application process.

BABAA – Build American – Buy American Act

Budget: A budget is a project manager's financial plan that lists the type of expenditures and the dollar amounts required to carry out project objectives.

Budget Period: A budget period is an interval of time in which the project is divided for budgetary purposes.

Carryover: A carryover is the remaining budget balance available from a project that may be continued into subsequent budget periods of the next fiscal year or budget period. Carryovers are not always automatic or allowed by all funding agencies.

CAS: Cost Accounting Standards pertaining to grant awards. CAS were designed to achieve uniformity and consistency in the measurement, assignment, and allocation of costs to government contracts.

CFDA: Catalog of federal Domestic Assistance, a database of all federal programs available to state and local governments. Replaced by Assistance Listing and found on [SAM.gov | Assistance Listings](https://www.sam.gov).

CFR: Code of Federal Regulations <https://www.ecfr.gov/search>



Grants Administration Manual

CSFA: Catalog of State Financial Assistance, a database of state projects that provide financial assistance to non-state entities. <https://apps.fldfs.com/fsaa/catalog.aspx>

Charlotte County EIN (FEIN/Tax ID): 59-6000541

Cost Overruns: Cost overruns are allowable costs incurred in excess of funding by the granting agency and required match by the County.

Cost Share: a.k.a. matching; those funds or services committed to a project and provided by the County or a third-party entity.

COTR: Contracting Officer's Technical Representative, an employee of the grantor responsible for managing the technical aspects of the grant.

Deliverables: Agreed upon tasks that are completed and submitted within a scheduled time frame. A written report is typically required to accompany each deliverable.

Disallowed/Ineligible Costs: Disallowed or Ineligible costs are costs that are not reimbursable by the grantor agency.

Unique Entity Identifier (SAM UEI) number: Charlotte County's SAM UEI is X3RBY2VEDJT3, contact the Grants and Contracts Manager if using a different number.

Eden: The County's electronic financial accounting system.

Effective Date: The date specified in the grant agreement on or after which, except for fixed price awards, expenditures may be charged to the grant. The Effective Date clause sets the date when the rights and obligations under the agreement become operational. The Effective Date need not be the same as the execution date. The effective date is the date that the agreement becomes effective and can be a specified date other than the date the agreement was signed. In the absence of an effective date, the terms of the agreement become operational upon execution.

Execution Date: The date that the final party signs the document. If no other date is specified, the contract is effective on the execution (signing) date.

Expiration Date: The date specified in the grant agreement after which expenditures may not be charged against the grant except to satisfy obligations to pay allowable project costs committed on or before that date.

Grant Period: The period of time between the effective date and the expiration date of a grant.



Grants Administration Manual

Electronic Grants: The administration of a grant using the electronic media which may not result in official hard-copy documents.

Encumbrances/Obligations: Encumbrances and obligations are the amount of items ordered, services rendered, contracts awarded, or similar transactions that are outstanding or unpaid at the end of the accounting period.

Equipment: Equipment is items non-expendable in nature- such as furniture, instruments, or repairable machines with a useful life of more than one (1) year, with a single unit cost in excess of \$1,000.

Federal Pass-Through: An award that comes from a state or non-federal source, but the prime source of funding originally came from a federal source.

Fiscal Year: The County's fiscal year is October 1 - September 30.

Florida Single Audit Act: The purpose of the act is to establish uniform state audit requirements for state financial assistance provided by state agencies to non-state entities.

Fully Executed Agreement: Fully executed agreement is an agreement that is signed by all parties involved.

Grantor/Granting Agency: Granting agency is the external organization funding a particular project.

Grants/Award: A grant agreement shall be used as the legal instrument whenever its principal purpose is the transfer of money, property, services, or anything of value to the state, local government or other recipient in order to accomplish a public purpose of support or stimulation authorized by federal statute.

Grant Coordinator: The County employee that has direct responsibility for carrying out the requirements of a grant project, for producing the final technical report, and for providing their required deliverables if applicable.

Matching/Cost Sharing: Matching or cost sharing is defined as the sharing of costs of a grant agreement by the County. Matching is typically done on grants and not contracts. Matching or cost sharing can be in the form of in-kind, cash, or a combination of both.

OMB: Federal Office of Management and Budget; issues Circulars that are instructions or information issued by OMB to federal agencies, which are then passed down to grant recipients.

Original Budget: First budget approved by the funding agency.



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Period of Performance: Period of time in which the project performance and related costs are incurred. The start date is the first day that activity and reimbursement of costs begin. Likewise, the end date is the last day that activity and related costs can be incurred.

Point of Contact: An individual who is designated as the person responsible for coordinating communication among the various parties associated with grants, i.e. granting agencies, auditors, program managers, third parties, subrecipients, and other interested parties.

Procurement Contract: A contract used when the principal purpose of the transaction is the acquisition of property or services for the direct benefit or use of the awarding entity.

Program Income: Program income means gross income received by the recipient or a subrecipient directly that is directly generated by a supported activity or earned as a result of grant funds during the period of performance. Program income includes but is not limited to income from fees for services performed, the use or rental of real or personal property acquired under grant funds, the sale of commodities or items fabricated under a grant, and license fees, etc. Program income must be used in accordance with the awarding agency's terms and conditions of the award.

Project Award: The project award is the approval and funding of a project as detailed in the official award document that specifies the amount of funding, project period, and any special requirements or restrictions.

Source of Funding:

Federal – agreements funded directly by the United States federal government.

Federal Pass-Through – grantor agreements where the County is not the prime recipient from the United States federal government, but is acting in the capacity of a subrecipient.

State – grantor agreements funded directly by the State of Florida.

State Pass-Through – An award that comes from a non-federal, non-state source, but the prime source of funding originally came from a State of Florida source.

Supplies: Supplies are expendable items that are consumed, worn out, or otherwise deteriorated in less than two years and having a purchase price of less than \$1,000.

Subcontracts: A subcontract is a contract that assigns some of the obligations of a contract to another party. The terms of the obligations are outlined in the same manner as described under contracts.

Subrecipient: A subrecipient is an organization that receives federal or state financial assistance to carry out a program for a primary recipient or another subrecipient. Such an organization is therefore subject to certain federal and /or audit requirements.



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Third-Party Administrator: This is an individual or firm hired by the County to handle the program manager's functions associated with a particular grant. The responsibilities and duties are identical to those of a County employee in the capacity as a project manager.

Total Project Cost: The cost of a grant project is comprised of allowable direct costs of the program, plus its allocable portion of allowable indirect costs, less applicable credits. This includes both the grantor's share and the County's share if applicable.

Unallowable Cost: Unallowable costs are costs that cannot be charged directly or indirectly to a grant.



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Useful Links

Debarred and Suspended Contractors - Federal Excluded Parties List System

https://sam.gov/search/?page=1&pageSize=25&sort=-modifiedDate&sfm%5Bstatus%5D%5Bis_active%5D=true&sfm%5BsimpleSearch%5D%5BkeywordRadio%5D=ALL

General Services Administration (GSA) website for the purpose of disseminating information on parties that are excluded from receiving federal contracts, certain subcontracts, and certain federal financial and non-financial assistance and benefits, pursuant to the provisions of 31 U.S.C. 6101, note, E.O. 12549, E.O. 12689, 48 CFR 9.404, and each U.S. agency's codification of the Common Rule for Non-procurement suspension and debarment.

Federal Government Contracting Regulations

<http://acquisition.gov>

Home to federal acquisition regulations (FARS) and other federal contracting opportunities and regulations.

Florida Department of Financial Services

<https://apps.fldfs.com/fsaa/>

This site leads you to the FDFS site for information on the Florida Single Audit Act and other important state grant related sites.

Florida Department of Management Services – Convicted Contractor List

http://www.dms.myflorida.com/business_operations/state_purchasing/vendor_information/convicted_suspended_discriminatory_complaints_vendor_lists

This site provides a list of the names and addresses of contractors who have been disqualified from participating in the public contracting process under [Section 287.133\(3\) \(d\), Florida Statutes](#).

Grants.gov

<http://www.grants.gov>

Grants.gov is the source to find and apply for federal government grants. Grants.gov is a central storehouse for information on over 1,000 grant programs and access to approximately \$400 billion in annual awards from the 26 federal agencies.

Justice Grants System (JustGrants)

<http://Justicegrants.usdoj.gov>

The Justice Grants System (JustGrants) is the Department of Justice's grants management system for the Office of Community Oriented Policing Services (COPS Office), the Office of Justice Programs (OJP) and the Office on Violence Against Women (OVW).



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MyFlorida.com

<http://www.myflorida.com/>

My Florida is the state of Florida portal for all state related matters. This link conducts a search for Florida state grants of any kind.

National Contract Management Association

<http://www.ncmahq.org/>

NCMA exists to enable the workforce to grow professionally, assess individual and organizational competency against professional standards, establish values, develop best practices, and provide access to skilled individuals, enabling enterprises to improve their buyer-seller relationships.

National Grants Management Association

<http://www.ngma.org>

NGMA connects professionals in the grants field to improve and unify the federal grants delivery process by bringing together the professionals involved in this process so that they may learn from each other.

Office of Management and Budget

<https://www.whitehouse.gov/omb>

The Office of Management and Budget (OMB) leads development of government-wide policy to assure that grants are managed properly and that federal dollars are spent in accordance with applicable laws and regulations. Their site contains links to OMB Circulars, grant forms, important policy documents and other useful grant links. Municipal grants are governed by OMB A-87, A-102, and A-133.

USA.gov

<http://www.usa.gov>

USA.gov provides the public with easy, one-stop access to all online federal government resources.

US Dept of Labor: Davis-Bacon Act

<https://www.dol.gov/agencies/whd/government-contracts/construction>

Federal Act that regulates the rate of wages for laborers and mechanics employed by contractors and subcontractors for construction, alteration, and/or repair, including painting and decorating, of public buildings or public works within the geographical limits of the States. The Act requires that laborers on federally funded construction projects more than \$2000 shall be paid the minimum wage determined by the Secretary of Labor to be prevailing for laborers employed on projects of a similar nature in the County, town, village, or other civil subdivision of the State in which the work is to be performed.