

FINANCE COMMITTEE POLICY
Fauquier County, Virginia

Policy Title: Grant Management
Policy Number: FC-5

Effective Date: September 11, 2014
Supersedes Policy Dated: January 1, 2013

I. PURPOSE

This document outlines the policies for any county program, department, or division that is submitting and/or administering a grant on behalf of Fauquier County. The purpose of this policy is to:

- Ensure that grant applications are within the scope of Fauquier County’s strategic goals.
- Facilitate coordination of Fauquier County department contacts throughout the lifecycle of a grant.
- Ensure that Fauquier County maintains compliance with the Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards.
- Minimize risks associated with non-compliance of grant requirements.

II. SCOPE

This policy applies to all grant applications for which the general County government is the applicant or for which the County is required to act as sponsor.

III. DEFINITIONS

A. Budget Action Form

A form that County departments complete and submit to the Office of Management and Budget (OMB) in order to initiate a supplemental appropriation, transfer, or de-appropriation of funds throughout the fiscal year.

B. Capital Project

Major construction, acquisition, or renovation activities which add value to a government’s physical assets or significantly increase their useful life.

C. Donation

A gift given voluntarily for charitable purposes, generally without any requirements or special conditions regarding use. While all unbudgeted revenues must be appropriated by the Board of Supervisors, donations are not subject to the requirements of this policy.

D. Fiscal Agent

An organization that acts as a sponsor for a project or group. A fiscal agent agrees to accept and execute grant awards.

E. Funding Source

The original financial source for a grant, typically in the form of a government agency or non-profit organization. Another term that can be used for Funding Source is Granting Agency.

F. Grant

A grant may be a sum of money, or services, given for specific purposes, typically as a result of a grant application or proposal which has been submitted to the funding organization.

G. Grant Action Plan

A plan of action created by departments to manage grants throughout their management and close-out phases.

H. Grant Application Summary

A form that County departments complete to highlight key grant information. This form initiates the County approval processes required before grant submission.

I. Multi-jurisdictional

A grant program that is completed by more than one jurisdiction or power(s) of authority working together in support of one program.

IV. GUIDELINES

- No grant application shall be submitted to the funding agency or organization without the prior approvals defined in the “Application Approvals” section of this policy.
 - Under extenuating circumstances, such as an emergency situation or in the event a department is not given adequate notice of a grant opportunity to comply with the timelines noted in the “Application Approvals” section of this policy, such department shall alert OMB immediately upon receiving notice of funding availability, to ensure OMB’s availability to assist with expediting the application and approval process.

- The only authorized signatory on behalf of Fauquier County is the County Administrator, unless otherwise designated by the Board of Supervisors and/or the County Administrator.
- Prior to submission, all grant applications shall be reviewed by OMB, using the Grant Application Summary.
- A Grant Application Summary shall be completed for every grant application. The form and the procedures for completing it in accordance with this policy are available through OMB.
- Unless otherwise noted in the grant agreement, a Request for Reimbursement (RFR) shall be submitted once per quarter or when a grant reimbursement would surpass \$25,000, whichever comes first.
- The Finance Department (Finance) shall be sent a copy of all RFR submissions.
- Finance and OMB shall be notified within one (1) business day if a grant audit has been issued.
- Grants are to be approved, whenever possible, through the annual budget process using the appropriate budget forms and the Grant Application Summary.
- If a final grant award differs from the grant award approved during the annual budget cycle, the department shall submit a BAF to either de-appropriate funds or request a supplemental appropriation within seven (7) business days of notice.
- The need to establish new and separate account codes for grants should first be confirmed with OMB. If necessary, OMB will initiate account(s) with Finance and the Treasurer's Office.
- All grants require award approval and appropriation from the Board of Supervisors, either through the annual budget process or at regular Board of Supervisors meetings. No grant funds will be disbursed until the grant has been accepted and appropriated by the Board of Supervisors.
- For grant awards that are accepted outside of the annual budget cycle, it is the responsibility of the requesting department to submit a BAF for all such supplemental appropriations for consideration by the Finance Committee.
- OMB shall maintain a current System for Award Management (SAM) user account to ensure the County's eligibility to apply for Federal grants.

V. PROCESS

A. Identification

1. Identify the need for grant funding to support a County initiative.
2. Search for grants utilizing eCivis, Grants.gov, Federal and State programs, and other alternative funding notification sources.
 - a. Determine the County's eligibility to apply.
 - b. Review application requirements.
 - c. Determine fiscal impacts.
3. OMB will notify the department (or vice versa) upon acknowledgment of the grant opportunity.

B. Application

1. Outside annual budget cycle:
 - a. Submit a Grant Application Summary and draft grant application to OMB for review.
 - b. Provide input to OMB, as needed, to determine the level(s) of approval required to submit the grant.
 - c. Submit the grant application through the required level(s) of approval and obtain approval.
 - d. Once approval has been obtained, submit the grant application per granting agency requirements.
2. During annual budget cycle:
 - a. In accordance with annual budget cycle deadlines, submit budget forms and the Grant Application Summary to OMB.
 - b. After approval has been obtained through the annual budget cycle, submit the grant application per granting agency requirements.

C. Award and Acceptance

1. Outside annual budget cycle:
 - a. Obtain grant award from Granting Agency.
 - b. Notify OMB of grant award within seven (7) business days of award date.
 - c. Coordinate with OMB to have the grant formally accepted and appropriated by the Board of Supervisors.
 - d. OMB will coordinate signature(s) from County Administration to accept the grant.
 - e. Send grant award acceptance documentation to the granting agency.
 - f. Send OMB a copy of all grant documents once they have been fully executed.
 - g. OMB will forward grant documents to Finance within ten (10) business days.
2. During annual budget cycle:
 - a. Obtain grant award from Granting Agency.
 - b. Notify OMB of grant award within seven (7) business days of award date.
 - c. OMB will coordinate signature(s) from County Administration to accept the grant.
 - d. Send grant award acceptance documentation to the granting agency.
 - e. Send OMB a copy of all grant documents once they have been fully executed.
 - f. OMB will forward grant documents to Finance within ten (10) business days.

D. Management

1. Collaborate with OMB and Finance to develop a Grant Action Plan, which details how the grant will be managed throughout its lifecycle.
2. Adhere to the Grant Action Plan.
 - a. In certain requirements, OMB and Finance reserve the right to review Requests for Reimbursement (RFRs) prior to submission.

3. Notify OMB and Finance if there are any changes to the Grant Action Plan.

E. Close-out

1. Send final reporting and close-out information to OMB.
2. OMB will coordinate signature(s) from County Administration, as needed.
3. Submit final reporting information to granting agency and send OMB a copy of this information.
4. Receive notification of grant close-out from granting agency and send OMB a copy of this information.
 - a. OMB will forward close-out information to Finance.

VI. APPLICATION APPROVALS

- The following approvals may be required in order for applications to be sent on behalf of Fauquier County:
 - Department Head
 - Department-specific Boards, as appropriate
 - Office of Management and Budget (OMB)
 - County Administrator (CAO)
 - Finance Committee
 - Facilities Planning and Implementation Committee (FPIC)
 - Board of Supervisors (BOS)
 - BOS Committees, as appropriate

- Departments shall adhere to the following deadlines, as needed:

Approving Body	Deadline
Department Head	Prior to submitting an application to OMB.
OMB	A minimum of seven (7) business days prior to the next level of approval deadline.
CAO	A minimum of seven (7) business days prior to the next level of approval deadline and/or the application deadline.
Finance Committee	A minimum of seven (7) business days prior to the Finance Committee agenda deadline for the desired meeting if the grant application must be reviewed by the Finance Committee. A completed grant application is not necessary for Finance Committee consideration.
FPIC, Department-specific Boards, and BOS Committees	A minimum of seven (7) business days prior to the FPIC agenda deadline for the desired meeting if the grant application must be reviewed by the FPIC. A completed grant application is not necessary for FPIC consideration.
BOS	A minimum of seven (7) business days prior to the BOS agenda deadline for the desired meeting if the grant guidelines require a public hearing and/or formal resolution by the BOS.

- Departments shall adhere to the following application approval requirements, keeping in mind that a grant application may fit into more than one scenario. If a grant application fits into more than one scenario, the department should adhere to the highest level of approval requirements.

Grant Application Scenario	Department Head	OMB	CAO	Finance Committee¹	BOS	FPIC	Department-specific Board or BOS Committee
No local match is required	X	X	X				
Local match can be found within the department's adopted budget	X	X	X				
There is no continuing commitment of local funds beyond the grant period	X	X	X				

A continuing commitment of local funds beyond the grant period can be met through reallocation of funds in the department's future budgets	X	X	X				
A continuing commitment of local funds beyond the grant period cannot be met through reallocation of funds in the department's future budgets	X	X	X	X	X		
The grant guidelines require a public hearing	X	X	X	X	X		
The grant guidelines require a BOS resolution	X	X	X	X	X		
The grant program scope is multi-jurisdictional	X	X	X	X	X		
The department cannot identify funds within its adopted budget to offset 100% of the local match	X	X	X	X	X		
Fauquier County is	X	X	X	X	X		

serving as the fiscal agent for the grant program							
The grant scope includes a capital, comprehensive maintenance, or major systems replacement project	X	X	X	X	X	X	
The grant scope fits within a Department-specific Board or a BOS Committee	X	X	X	X	X	X	X

¹ If a grant's application timeline is limited and does not allow for Finance Committee review, OMB will arrange for the grant to bypass Finance Committee and move straight to a BOS approval at the next regularly scheduled BOS meeting.

Appendix

Fauquier County acknowledges the following information on the newly-mandated Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards:

- These newly-mandated requirements are effective on December 26, 2014.
- These newly-mandated requirements affect all Federal grant awards after this effective date, including existing programs that seek additional funding allocations.
- Failure to adhere to newly-mandated requirements risk the County denial of Requests for Reimbursement(s), as well as the potential for future funding award denials.
 - Individual County departments can place the entire County at risk for future funding.
- The three major areas of change in requirements encompass the administration of Federal awards, cost principle reforms, and audits.
 - There is a large emphasis on performance goals and performance reporting.
 - If a department fails to adhere to performance goals and reporting outlined in the grant program, the County is at risk for reimbursement and future funding.
 - Finance and OMB shall be notified within one (1) business day if a grant audit has been issued.

For more information on these newly-mandated requirements, please visit:

<https://www.federalregister.gov/articles/2013/12/26/2013-30465/uniform-administrative-requirements-cost-principles-and-audit-requirements-for-federal-awards>