

**460.2 SUBJECT: GRANTS MANAGEMENT & ADMINISTRATION**

**:1 OBJECTIVE:**

The purpose of Grant Management and Administration policies and procedures is to develop, implement and maintain meaningful grant oversight and coordination for the City thereby increasing grant related revenue, limiting the City's exposure to grant related legal liability, and improving the efficiency and impact of programs and services funded through grants.

**:2 AUTHORITY:**

This procedure was adopted by City Council October 15, 2007, Item A11.

**:3 DIRECTION:**

The Chief Financial Officer, as an appointed official, serves at the pleasure of, and receives direction from the Mayor.

**:4 FUNCTIONS:**

**A. INTRODUCTION**

City government, as an institution, has multiple partners including citizens, taxpayers, businesses, visitors, employees, and other governments. As a major institutional, economic, and service force in the region, it is important that the City strengthen relationships with its partners by adopting clear and comprehensive financial policies.

Grant funds received by the City of Orlando (the "City") support important programs and services that the City provides to the community. These funds allow the City to extend pre-existing services, introduce new initiatives, gain technological advances, and subsidize programmatic staffing. Grant funds are dispersed throughout the City and impact a variety of efforts, including homeland security, economic development, social services, public safety, recreation, and infrastructure improvement and maintenance, among others. Because grant funding allows the City to leverage local public funds in order to extend and enhance the services it offers to the community, the impact of grant funding upon the community is significant, with the process of grants administration and management a critical and important function. Furthermore, the financial integrity of the City of Orlando is of utmost importance, and adopting a set of financial policies is a key element to maintain this integrity.

These policies and procedures are intended to foster exceptional stewardship of the public trust through a rigorous adherence to ethical and professional standards associated with grant related activity. Adherence to these policies and procedures will promote efficiency, better transparency, greater accountability, a strategic approach to funding opportunities, and generally place the City in a more competitive position for securing grant funds.

If specific direction relative to grants cannot be located in this policy, please refer to the City of Orlando policies and procedures or contact the Grants Development Supervisor for assistance.

**B. TYPES OF GRANT FUNDING**

The City of Orlando considers the term *grant* to include the following funding types:

1. **Block Grants** – a broad intergovernmental transfer of funds or other assets by the U.S. Congress to state or local governments for specific activities such as secondary education or health services, but with few restrictions attached. Block grants are distributed according to legal formulas defining broad functional areas such as health, income security, education or transportation. They are used for a variety of activities, largely at the recipient’s discretion.
2. **Competitive (Discretionary) Grants** – an award of financial assistance in the form of money, or property in lieu of money, by the Federal government to an eligible grantee, usually made on the basis of a competitive review process.
3. **Continuation of any grant type** – a continuation grant provides additional funding for budget periods subsequent to the initial budget period.
4. **Conditional Grant** – a conditional grant involves one grantmaker seeking the involvement of others by making their grant (only a part of the total costs of a project) conditional upon the remainder of the cost being funded from another source.
5. **Cooperative Agreements & Contracts** – a type of Federal assistance; essentially, a variation of a discretionary grant, awarded by a Federal agency when it anticipates having substantial involvement with the grantee during the performance of a funded project.
6. **Earmark** – refers to a provision in legislation requiring that a portion of a certain source of revenue be designated for specific projects usually at the request of a legislator. Typically, the City 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. Earmarking bypasses the normal procedure by which revenues are pooled in a general fund and then allocated among various government spending programs as opposed to a specific project.
7. **Formula Grants** – a grant that the Federal 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 regulations; this funding is directly awarded and administered in the Federal agency’s program offices.
8. **Pass-thru of any grant type** – grant funds received from one grantor, but passed through another grantor or funding source.
9. **Reimbursement Programs** – a type of funding program under which the grantee is reimbursed for qualifying expenditures already incurred, as specified in the terms of the grant agreement for such a program.
10. **County Grants** – a grant made by County Government.
11. **State Grants** – a grant made by State Government.
12. **Federal Grants** – a grant made by the Federal Government.
13. **Foundation Grants** – a grant made by a philanthropic foundation.
14. **Corporate Grants** – a grant made by a corporate foundation.

### C. GRANT ROLES AND RESPONSIBILITIES

The purpose of this policy is to establish the roles and associated responsibilities of the various City of Orlando departments, divisions and offices, henceforth referred to as “departments” involved in the grant process. City departments and their staff that occupy positions of responsibility with respect to grant activity have specific roles and responsibilities that they shall perform and uphold both ethically and in the best interests of the City of Orlando.

Roles are addressed herein for the: Chief Financial Officer (CFO), Finance Department, Grants Development Supervisor, Management and Budget Division, Grants Oversight Committee (GOC), City departments, divisions and offices that apply for or receive grant funds, Grants Oversight Committee Liaison (GOC Liaison), Grants Coordinator, Grants Program Manager, City Attorney’s Office, Chief Administrative Officer, Chief of Staff, Mayor and Purchasing.

#### 1. Finance Department

- a) **Chief Financial Officer (CFO)** - The CFO or designee has authority to approve and sign grant applications for the Finance Department at the time of application submission.
- b) The **Finance Department**, through its **Finance Grants Unit** is responsible for the oversight of grant related financial activity. In this role, the Finance Grants Unit reviews financial reports generated by recipient departments, works with the City Attorney to identify and investigate issues that may arise with respect to the management of City grants, and provides general oversight of other grant related issues, including the proper budgeting and accounting for grants and other responsibilities indicated throughout this policy.
- c) The **Grants Development Supervisor** is responsible for general management and administration of the City's grant activities to include: annual Citywide grant management planning and goals; chairing the Grants Oversight Committee; facilitation of departmental grant planning and collaborative grant submittals; grant training and technical assistance for City staff; ensuring that departments track and report departmental grant activity; maintenance of grant policies and procedures, grants manual, the Grants Management Database and informational web pages; ensuring the promotion of grant opportunities; and identifying and investigating issues that may arise with respect to the management of City grants.
- d) **Management & Budget Division** - The Management & Budget Division is responsible for creating a grant fund and/or project number, which is used to recognize grant revenue and expenditures in the department or division’s budget.

2. **Grants Oversight Committee (GOC)** – The Grants Oversight Committee is a committee comprised of liaisons from each department, designated divisions and offices and is the mechanism for communication between the Grants

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Development Supervisor and City departments about grants management and administration.

3. **City Departments, Divisions and Offices** – City departments, divisions and offices (“departments”) that apply for and utilize grant funds are responsible for all aspects of the grant process including planning for grant acquisition, preparation and submission of grant proposals, grant writing, preparing City Council Agenda items to accept grant awards, preparing budget revision requests to accept grant funds, developing grant implementation plans, managing grant programs and projects, preparing and submitting reports to grantors, and properly closing out grant projects as detailed in this policy and the grant agreement or award letter that delineates the terms and conditions of the grant. The following roles further define grant related responsibilities:
  - a) **Grants Oversight Committee Liaison (GOC Liaison)** – The GOC Liaison is a key component in the success of the City’s grants management and administration goals. To facilitate communication, each Department Director shall select an individual, called the GOC Liaison, to represent the department on the Grants Oversight Committee and to be the department’s point of contact with the Grants Development Supervisor. The Department Director may designate more than one GOC Liaison if department grant activity requires more than one GOC Liaison. The GOC Liaison shall:
    - (1) Communicate grant related information from the Grants Development Supervisor, GOC meetings and communications to all staff in their department with grant responsibilities.
    - (2) Serve as the conduit for grant related ideas and information from the department back to the Grants Development Supervisor and GOC.
    - (3) Have the authority to obtain necessary approvals and signatures as indicated in this policy.
    - (4) Ensure City grant policy and procedure is being followed in the department.
    - (5) Report their department’s grant activity to the Grants Development Supervisor and enter their department’s grant activity in the Grants Management Database as outlined in this policy.
    - (6) Participate in GOC meetings and subcommittee meetings to accomplish committee goals and objectives as needed.
    - (7) Share ideas and expertise in grant related meetings and training events as requested.
  - b) **Grant Coordinator** – The employee responsible for coordinating a grant application within a department.
  - c) **Grant Project Manager** – The employee responsible for managing the program or project funded by the grant within a department.
4. **City Attorney’s Office** – Prior to City Council consideration, the City Attorney’s Office shall conduct a legal review of grant applications and

subsequent agreements or contracts. The City Attorney or designee has authority to approve and sign grant applications for the City Attorney's Office at the time of application submission.

5. **Chief Administrative Officer (CAO)** – The CAO or designee has authority to approve and sign grant applications for City operating departments at the time of application submission. In addition, the CAO or designee in consultation with the CFO shall be the final arbiter of which department will submit the application when internal competition for a grant application cannot otherwise be resolved or to obtain approval to submit multiple applications to a grantor.
6. **Chief of Staff** – The Chief of Staff or designee has authority to approve and sign grant applications for the Executive Offices at the time of application submission.
7. **Mayor** – The Mayor or designee sign grant agreements that have been approved by City Council and delivered for signature by the City Clerk.
8. **Purchasing** – The Purchasing Department processes purchase orders according to the grant agreement, federal and state laws and regulations, and City Code and policy. All other activities related to procurement, including funds received as a grant, must follow City Policy and Procedure 1000.7, *Procurement of Goods and Services*, City Code, Chapter 7 and OMB Circular A-102 (Revised 10/07/94, as further amended 8/29/97).

#### D. CONFLICT OF INTEREST

Grant audit findings due to conflicts of interest can damage the reputation and credibility of the City. Further, the appearance of a conflict of interest can be just as damaging to the City's reputation and credibility as an actual conflict. The purpose of this policy is to avoid the appearance, as well as the actuality, of any conflict of interest or breach of trust by an official or employee of the City.

1. No officer or employee of the City shall have any interest, financial or otherwise, direct or indirect, or have any arrangement concerning prospective employment that will, or may be reasonably expected to, bias the design, conduct, or reporting of a grant funded project on which he or she is working.
2. The Grant Project Manager for each particular grant funded project shall ensure that in the use of project funds, officials or employees of the City and nongovernmental recipients or sub-recipients shall avoid any action that might result in, or create the appearance of:
  - a) Using his or her official position for private gain
  - b) Giving preferential treatment to any person or organization
  - c) Losing complete independence or impartiality
  - d) Making an official decision outside official channels
  - e) Affecting adversely public confidence in the grant funded program in particular and the City in general
  - f) Any violation of this provision is governed by City Policy & Procedure 800.5, *City of Orlando Ethics Policy*.

E. LETTER OF SUPPORT REQUESTS FROM EXTERNAL ORGANIZATIONS

External organizations frequently seek support from the City for grant applications they intend to submit to a grantor. Requests for such support are often made to department staff or directors who may be unaware of whether other City departments are competing for the same grant opportunity. Additionally, there may be other reasons why it would not be in the City's interests to provide a letter of support.

REQUESTS FOR LETTER OF SUPPORT PROCEDURE

Letters of support for a grant application prepared by an external entity, and for which the City is not a collaborating partner, shall be coordinated by the Department Director in consultation with the Grants Development Supervisor, CFO, City Attorney's Office and the department's authorized signatory as defined in Section H before submission to the requesting organization.

1. Upon receiving a request from an external organization for a letter of support for a grant application it intends to submit to a grantor, the department must decide whether to support the request.
2. The Department Director is responsible for consulting with the department's authorized signatory as defined in Section H, documenting the information and reasoning behind the decision, and for ensuring that no potential liabilities to the City will be incurred as a result of their action.
3. If the Department Director decides he/she supports the request and would like to provide a letter of support, he/she must provide the Grants Development Supervisor with the name, mission and activities of the requesting organization, the name and description of the proposed project, and whether or not there will be future obligations by the City.
4. The Grants Development Supervisor will ensure the City is not in competition, or is likely to be in competition for the same grant opportunity by comparing the request to pre-application reporting received from City departments.
5. If the City is likely to be in competition with the same grant opportunity, the request for a letter of support shall be denied.
6. If approved, the Department Director may supply the appropriate letter of support and provide a copy of the letter to the Grants Development Supervisor.

F. INTERNALLY COMPETING APPLICATIONS

Grantors generally will not consider any proposal from a jurisdiction if that jurisdiction has submitted more than one proposal during the same funding round. Even if the grantor allows competing applications from the City, it may not be in the best interest of the City to compete against itself. The purpose of this policy is to identify the procedure for resolving such conflicts.

INTERNALLY COMPETING APPLICATIONS PROCEDURE

1. Upon identifying the potential for the submission of multiple grant applications to the same grantor during the same funding cycle, the Grant Coordinator shall confirm with the grantor's program manager in writing to determine if the

grantor permits multiple submissions and inform their department or division's GOC Liaison and the Grants Development Supervisor.

2. The Grants Development Supervisor shall take appropriate steps to resolve the situation, such as determining whether one department is better suited to pursue the grant, if more than one department should work together to pursue the grant or if more than one application may be submitted.
3. If the departments cannot agree upon a solution, the Grants Development Supervisor will present the competing recommendations to the CAO.
4. The CAO, in consultation with the CFO shall take the recommendation(s) into consideration and make the determination of which department(s) shall submit the application.

#### G. GRANTS MANAGEMENT DATABASE

The Grants Management Database is a tool to assist in the management of grants awarded to the City, improve coordination, enhance oversight and provide a snapshot of the current Citywide grant landscape. It is maintained by the Grants Development Supervisor. This section shall describe the use of the Grants Management Database and establish the responsibilities for entering the required grant related data.

##### GRANTS MANAGEMENT DATABASE PROCEDURE

1. All City staff must immediately report **all grant activity** to their department or division's GOC Liaison. This shall include grants being considered for a program or project (even if not ultimately pursued) and grant applications submitted.
2. The GOC Liaison for each department or division must conduct a check of the database to determine if there is another record of intent to submit an application for the same grant opportunity.
3. If another record for the same grant opportunity exists within the same grant year or cycle, the GOC Liaison must notify the Grants Development Supervisor. The Grants Development Supervisor will resolve potential conflicts in accordance with Section F in this policy.
4. If no record of the same grant opportunity exists within the same grant year or cycle, the GOC Liaison must enter the required grant tracking information contained in the Grants Management Database.
5. Each grant record shall be updated upon any change to the status of the grant and/or the information previously entered.

#### H. AUTHORIZED WRITTEN SIGNATURE

1. The purpose of this policy is to identify who may approve and provide authorized written signatures on grant applications and subsequent grant agreements. This shall be done well in advance of grant submission due dates to avoid last minute delays or problems that could cause the grant deadline to be missed.

2. This written signature authority is different from the electronic signature authority granted to specific individuals in departments for the purposes of submitting an online grant application or quarterly reports as indicated in Section I below.
3. There are five authorized signers: Chief Administrative Officer, Chief Financial Officer, Chief of Staff, City Attorney, and the Mayor.
  - a) **Chief Administrative Officer** – The CAO or designee is authorized to approve and provide authorized written signature on grant applications for City operating departments.
  - b) **Chief Financial Officer** – The CFO or designee is authorized to approve and provide authorized written signature on grant applications for the Finance Department.
  - c) **Chief of Staff** – The Chief of Staff or designee is authorized to approve and provide authorized written signature grant applications for the Executive Offices.
  - d) **City Attorney** – The City Attorney or designee is authorized to approve and provide authorized written signature on grant applications for the City Attorney’s Office.
  - e) **Mayor** – The Mayor or designee may only sign grant agreements that have been approved by City Council. The City Clerk is solely responsible for obtaining this signature.
4. Authority over a specific grant project or program, grant application or grant agreement may be delegated in writing to address circumstances that warrant delegation or provide efficiency.
5. If a grantor requests a signature other than what is defined above, a copy of this policy may be provided to grantors as documentation authorizing that person to sign.

#### I. AUTHORIZED ELECTRONIC SIGNATURE

Many federal and state grant programs have the requirement or option of submitting grant applications and reporting through the internet. The purpose of this policy is to identify the procedure to provide authorized electronic signatures.

##### AUTHORIZED ELECTRONIC SIGNATURE PROCEDURE

1. All grant applications submitted through the internet shall comply with the standard policies and procedures for submission of grant applications as described in this policy.
2. The individual submitting the grant must be designated as an authorized electronic signatory by his/her Department Director.
3. The Department Director shall send an email to the Grants Development Supervisor requesting and/or notifying authorized electronic signature status for each designated staff person he/she selects. This shall be done well in advance of grant submission due dates to avoid last minute delays or problems that could cause the grant deadline to be missed.

4. The Grants Development Supervisor will arrange authorized signature status for the designated staff person(s).
5. The Grants Development Supervisor will confirm authorized signature status with the Department Director, GOC Liaison and authorized signatory upon completion.

J. D-U-N-S NUMBER

Dun & Bradstreet (D&B) issues a D-U-N-S Number, a unique nine digit identification number that is required to apply for US federal government contracts or grants.

1. The Finance Department has the **sole responsibility** of managing and obtaining D-U-N-S numbers for the City of Orlando from the federal government's Central Contractor Registry.
2. Contact your department or division's GOC Liaison or Grants Development Supervisor to obtain the City of Orlando's D-U-N-S number.

K. GRANT SEEKING PROCESS

In order to coordinate the City's grant activities effectively and support the City's strategic priorities, the Grants Development Supervisor must have knowledge of prioritized department needs for the various departments that potentially can be met through grants. This knowledge will allow the Grants Development Supervisor to identify the potential for parallel or redundant submissions, as well as areas for potential collaboration among departments, plan for submission of proposals to regular cyclical grant opportunities, and be pre-positioned to assist the departments in the submission of proposals to those opportunities when they arise.

The grant seeking process has three components: (1) the development of a departmental grant seeking plan (2) pre-application assessment and review and (3) application submission. A flow chart depicting the process is included at the end of this policy.

1. GRANT SEEKING PLAN

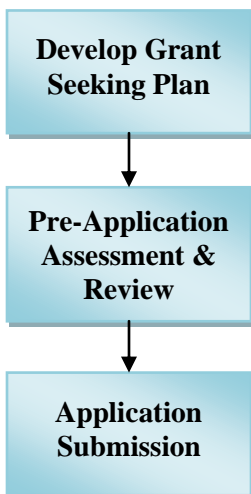
The purpose of this policy is to promote a strategic approach to grant seeking, to enhance the City's ability to coordinate grant activity on a Citywide basis and provide an annual overview of department-level needs that have the potential for being met through grant funding.

GRANT SEEKING PLAN PROCEDURE

- a) Each City department that seeks grant funding must produce a prioritized list of department or division needs to the Grants Development Supervisor that can potentially be met through grant funding on an annual basis.
- b) These needs shall be aligned with the City's strategic plan and department or division business plans.

2. PRE-APPLICATION ASSESSMENT & REVIEW

The purpose of this policy is to encourage the pursuit of grant opportunities that support the City's strategic priorities, while ensuring that possible costs to the City are identified and considered as early as possible. The department or



division's GOC Liaison shall ensure the grant record in the Grants Management Database is updated and complete at the time of application.

#### PRE-APPLICATION ASSESSMENT & REVIEW PROCEDURE

The department considering an application for a grant is responsible for pre-application assessment, in which the following factors shall be evaluated in consultation with the department's Fiscal Manager or equivalent, Management and Budget Analyst and authorized signatory as defined in Section H.

Pre-application assessment shall be done well in advance of grant submission due dates to avoid last minute delays or problems that could cause the grant deadline to be missed.

#### a) Pre-Application Assessment

##### (1) Financial

- Total anticipated project cost
- Match requirements and sources
- Program income considerations
- Staffing requirements (including salary and benefits increases for multi-year grants)
- Receipt of grant funds. See City Policy and Procedure 432.4, *Revenue Collections*.
- Documentation of a clear continuation plan. It is required that departments develop continuation plans (plans for sustaining grant funded programs if funding is reduced or terminated) prior to applying for grants, which reflect the potential for loss of funding and the subsequent loss of grant funded positions or program components. Departments must plan responsibly for either termination or reduction of the program or seek to secure alternative sources of funding. See City Policy and Procedure 450.3, *Revenue Policy*.

##### (2) Programmatic

- Alignment with City's strategic priorities and/or department's business plan
- Provision or expansion of services to address critical needs
- Department's capacity to administer the financial and administrative aspects of the grant

#### 3. APPLICATION SUBMISSION

The purpose of this policy is to ensure that each grant application submitted by or on behalf of the City is aligned with an established City priority, meets the City's expectations of document quality, has matching funds available if required by grantor, and that the means for continuation of the project or program after the grant period ends has been given realistic consideration.

The department submitting the grant application is responsible for ensuring that pre-application assessment factors noted above have been evaluated and completed prior to submission.

#### APPLICATION SUBMISSION PROCEDURE

- a) Approval to submit a grant application shall be obtained via the Transmittal of Grant Application routing slip as follows: (1) Department Director (2) Grants Development Supervisor, (3) CFO (4) approval and/or signature from the department's authorized signatory as defined in Section H and (5) approval from the City Attorney if Council Approval is required by the grantor at the time of submission.
- b) Grant applications must be sent for review to the Grants Development Supervisor at least five business days prior to PA Budget Review if Council Approval is required by the grantor at the time of submission. If Council Approval is not required by the grantor at the time of submission, grant applications must be sent for review to the Grants Development Supervisor at least five business days prior to application submission.
  - (1) The Grants Development Supervisor will confirm the grant is recorded in the Grants Management Database and will provide critical review of grant applications to ensure accuracy, document quality, coordination, multiple applications from the City of Orlando are not being submitted unless otherwise approved, and policy and procedure is followed.
  - (2) The Grants Development Supervisor will inform the department via email if the grant application is approved for submission or if changes need to be made to resolve issues before it can be submitted. If the department cannot resolve issues, the Grants Development Supervisor will notify the department and the department's authorized signatory as defined in Section H.
- c) The department is responsible for obtaining required authorized written signature as noted in Section H at the time of application submission and for submitting the grant application to the grantor by the grant application due date. Grant applications must be clearly labeled at each location that requires a signature with a "sign here" label.
- d) The department shall prepare a council agenda item for City Council approval to submit a grant application if required by the grantor at the time of submission.

#### L. AWARD NOTIFICATION, REVIEW AND ACCEPTANCE

Grant agreements are legal contracts. It is the City's responsibility to carry out the project and/or activities associated with a grant to accomplish its objectives, while adhering to all of the terms and conditions prescribed by the grantor. Failure to do so increases the City's exposure to legal liability and compromises current and future grant funding. Therefore, the City carries a significant legal and ethical responsibility when accepting grant funding.



The award notification, review and acceptance process has two components: (1) award notification and review and (2) City Council approval to accept the award. A flow chart depicting the process is included at the end of this policy.

1. AWARD NOTIFICATION AND REVIEW PROCEDURE

- a) All departments that receive a grant award shall date stamp, duplicate, and forward a copy of the award notification, the grant agreement or contract, and any memoranda of understanding to the Grants Development Supervisor within two days of receipt.
- b) The department is responsible for reviewing the grant award and ensuring that legal review and City Council approval to accept the award is completed by the date required by the grantor for full execution.
- c) In the event that funds awarded by the granting entity are reduced from those requested in the original grant application, or factors previously evaluated at the time of application have changed, the department must ensure that the goals, objectives and evaluative components of the grant can still be accomplished within the prescribed timeframe set by the grantor.
- d) If award terms need to be amended before the grant award can be accepted, the department must negotiate with the grantor and obtain changes to the grant award in writing.
  - (1) If the award terms are negotiated to the department's satisfaction, the department must request that the grantor provide the changes in writing. When the changes have been received in writing from the grantor, the department must submit the grant agreement or contract, any memoranda of understanding and written changes from the grantor to the Grants Development Supervisor within two business days of receipt.
  - (2) If the award terms cannot be negotiated to the department's satisfaction, the Department Director from the recipient department must prepare a letter to the granting entity declining the award, and provide a copy of the letter to the Grants Development Supervisor, Chief Financial Officer and the department's authorized signatory as defined in Section H. The letter should express the City's regret in declining the award and clearly articulate the specific reason(s) the award is being declined.
- e) The City 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 City's interests are protected prior to the department's submission of a council agenda item to accept grant funds.
  - (1) If the legal review identifies any potential legal issues stemming from the terms and conditions of the agreement, the submitting department must contact the granting entity and seek to resolve the issue.

- (2) If a resolution cannot be reached, the submitting department must prepare a letter to the granting entity to decline the award and provide a copy of the letter to the Grants Development Supervisor, Chief Financial Officer and the department's authorized signatory as defined in Section H.
  - (3) If the legal review identifies no potential legal issues stemming from the terms and conditions of the agreement, the department may submit a council agenda item to accept grant funds.
- f) The department or division's GOC Liaison must ensure the grant record in the Grants Management Database is updated and complete at the time of award.

## 2. COUNCIL APPROVAL TO ACCEPT AWARD PROCEDURE

The purpose of this policy is to ensure that acceptance of each award granted to the City is formally authorized by City Council.

- a) The department receiving the grant award must prepare a council agenda item and fiscal impact statement and submit it for council approval before any funds from the granting entity are appropriated or expended. The agenda item must be accompanied by the award letter, grant agreement and any other required documentation.
- b) The department must prepare a budget revision request to the Management and Budget Division to add the grant award to the department's budget. The fund and project into which the grant funds are to reside must be clearly stated.
- c) The department must ensure the City Clerk has the required amount of original grant awards ready for the Mayor's signature. Grant awards must be clearly labeled at each location that requires a signature with a "sign here" label.
- d) Once City Council has approved the grant award, the recipient department shall notify the Grants Development Supervisor of the Council's action and ensure the City Clerk has obtained the Mayor's signature as required.
- e) The department is responsible for submitting the grant award(s) to the grantor by the grant award due date.
- f) The department must provide an original of the fully executed grant agreement to the City Clerk's Office and Grants Development Supervisor when the fully executed grant award is returned to the City by the grantor.

## M. USE AND RECEIPT OF GRANT FUNDS

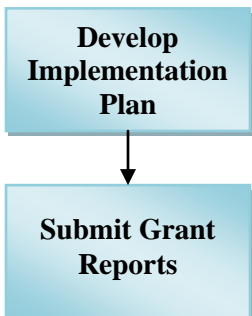
The purpose of this policy is to ensure that grant funds are properly used and received by the City of Orlando. Violations can result in a range of penalties, including suspension of future funds from the grantor, return of all funds associated with the award, including those already expended, and civil and/or criminal penalties.

1. All departments receiving grant funds shall adhere to City Policy and Procedure 432.4, *Revenue Collection* and 410.3 *Accounting and Reporting of Grants Received by the City*.
2. No grant funds shall be disbursed until a council agenda item and budget revision request have been approved by City Council, a project has been established in an appropriate fund and required documentation is complete.
3. Modifications to the budget associated with a grant funded project in such a way that alters the grant amount or moves funds from one budget line item to another must adhere to City policy and procedures for budget modifications and grantor requirements.
4. Grant funds awarded to the City of Orlando 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 granting entity in the grant award.
5. All income resulting from a grant funded project or program shall adhere to City Policy and Procedure 450.3, *Revenue Policy* and be managed and maintained as established in the award letter, grant agreement, contract, special conditions, or other document generated by the granting entity.
6. All procurement activity associated with grant funded projects or programs shall follow the procedures outlined in City Policy and Procedure 1000.7, *Procurement of Goods and Services*, City Code, Chapter 7 and OMB Circular A-102 (Revised 10/07/94, as further amended 8/29/97). A copy of the grant agreement and/or documentation specifying grantor purchasing requirements must be provided to Purchasing to ensure compliance.
7. All property acquired through grant funds shall follow the procedures outlined in City Policy and Procedure 1000.4, *Property Control*.
8. All grant and any related matching fund revenues and expenditures shall be recorded in the grant project. Any revenues or expenditures that occur in another program/project that are applicable to a grant or that are used as a match shall have a journal entry (JE) made to put the revenues or expenditures in the appropriate grant project with a detailed explanation, including original G/L date and batch information. Revenues received shall not be deposited into an expenditure account unless an item purchased was returned.
9. Grant project managers are ultimately responsible for adherence to the stipulations outlined in the approved grant award/contract to ensure that allowable expenditures are incurred.

N. GRANT OVERSIGHT AND MONITORING

The purpose of this policy is to ensure that all grant funded programs or projects are managed according to the terms set forth in the grant agreement, Grant Management and Administration Policies and Procedures and other applicable City policies and procedures.

The grant oversight and monitoring process has two components: (1) develop implementation plan and (2) submit reports as required.



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1. DEVELOP IMPLEMENTATION PLAN

- a) All City departments that receive grant awards must develop an implementation plan within 30 days of City Council approving a grant award.
- b) The GOC Liaison shall submit the implementation plan to the Grants Development Supervisor.
- c) Departments with existing work plans that provide the elements noted below and plans already included in the grant application or grant award are acceptable implementation plans.
- d) The grant implementation plan shall have the following elements:
  - (1) Project overview
  - (2) Project goals and objectives
  - (3) Identification of activities and dates
  - (4) Identification of roles and associated responsibilities
  - (5) Anticipated expenditure schedule
  - (6) Evaluation matrix that identifies the measurable objectives, the metrics used to measure them, the anticipated completion date, and fields to enter the actual completion date and outcome measures.

2. GRANT REPORTING

Grants awarded to the City may require that progress, programmatic and financial reports be submitted to the grantor. Accurate and timely reporting is critical to maintaining a good relationship with the grantor. Late or inaccurate reports may negatively impact current or future funding.

GRANT REPORTING PROCEDURE

- a) Recipient departments must prepare timely and accurate progress, programmatic or financial reports as required by grantor.
- b) If the report preparer is not the department's Fiscal Manager or equivalent, the preparer shall submit all financial reports to the Fiscal Manager for review and approval before submitting them to the grantor. If the preparer is the department's Fiscal Manager or equivalent, the reports shall be submitted to the appropriate Department Director before submitting them to the grantor.
- c) Copies of all financial status and final reports prepared for submission to the grantor shall be provided, along with the associated grant name and year to the Grants Development Supervisor and Finance Department Chief Accountant at the time of submission to the grantor.
- d) The Finance Department Chief Accountant will review the financial reports for content and quality and address any issues with the recipient department. Upon satisfaction with the report, the Finance Department Chief Accountant will place a copy of the report in the master file. The

recipient department must provide support or reconciliation to the general ledger.

- e) The Grants Development Supervisor will review any programmatic reports for content and quality and address any issues with the recipient department. Upon satisfaction with the report, the Grants Development Supervisor will place a copy of the report in the master file.

#### O. FILE MANAGEMENT, ACCESS AND RETENTION

The Grants Development Supervisor or the Chief Financial Officer or designee may review the files, activities, equipment, and facilities, and interview relevant personnel and contracted entities of any City of Orlando project or program that is funded with grants awarded to the City.

##### 1. FILE MANAGEMENT PROCEDURE

All department and master files associated with a grant award must maintain a file structure that includes the following five sections with clear separations between different fiscal years, unless otherwise directed by the grantor:

- a) **Submittal** (e.g., application guidance and a copy of the application)
- b) **Research** (e.g., statistical and other information used in preparation of and support of the grant)
- c) **Award** (e.g., award letter, council agenda item, grant agreement, grant amendments, modifications, extensions, cancellations and terminations and anything else related to the award)
- d) **Finance** (e.g., account set up, purchase orders, invoices)
- e) **Reports** (e.g., reports to granting entity and evaluation components)

##### 2. FILE RETENTION PROCEDURE

The City of Orlando maintains records for at least five years following the closure of its most recent audit report. 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.

- a) Grantors may require retention periods in excess of five years. Departments must ensure they comply with retention requirements specified by each grantor.
- b) 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.
- c) 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.

- d) File Maintenance Recipient departments are also obligated to protect records adequately against loss, theft, fire or other damage in accordance with statutory provisions of Chapters 119 and 257, Florida Statutes, as outlined in the most current General Records Schedule.

P. GRANT CLOSEOUT

Upon completion of the grant term of each grant award, the recipient department shall alert Finance Department's Budget Analyst to place the fund and/or project in a no posting status.

GRANT CLOSEOUT PROCEDURE

1. Upon completion of the grant period of each grant, the recipient department must prepare a memorandum to the Finance Department's Budget Analyst and Grants Development Supervisor that identifies the name of the grant, the project number and describes the final disposition of the funds and required activities.
2. Upon review of the memorandum and satisfaction of any discrepancies, Finance Department's Budget Analyst will update the accounting system and confirm grant closeout with the Grants Development Supervisor.
3. The grant closeout memo shall be placed in the grant's master file.

:5 FORMS:

Transmittal of Grant Application routing slip.

:6 COMMITTEE RESPONSIBILITIES:

The Grants Oversight Committee, under the direction of the Grants Development Supervisor, is responsible for reviewing and updating these policies on an annual basis.

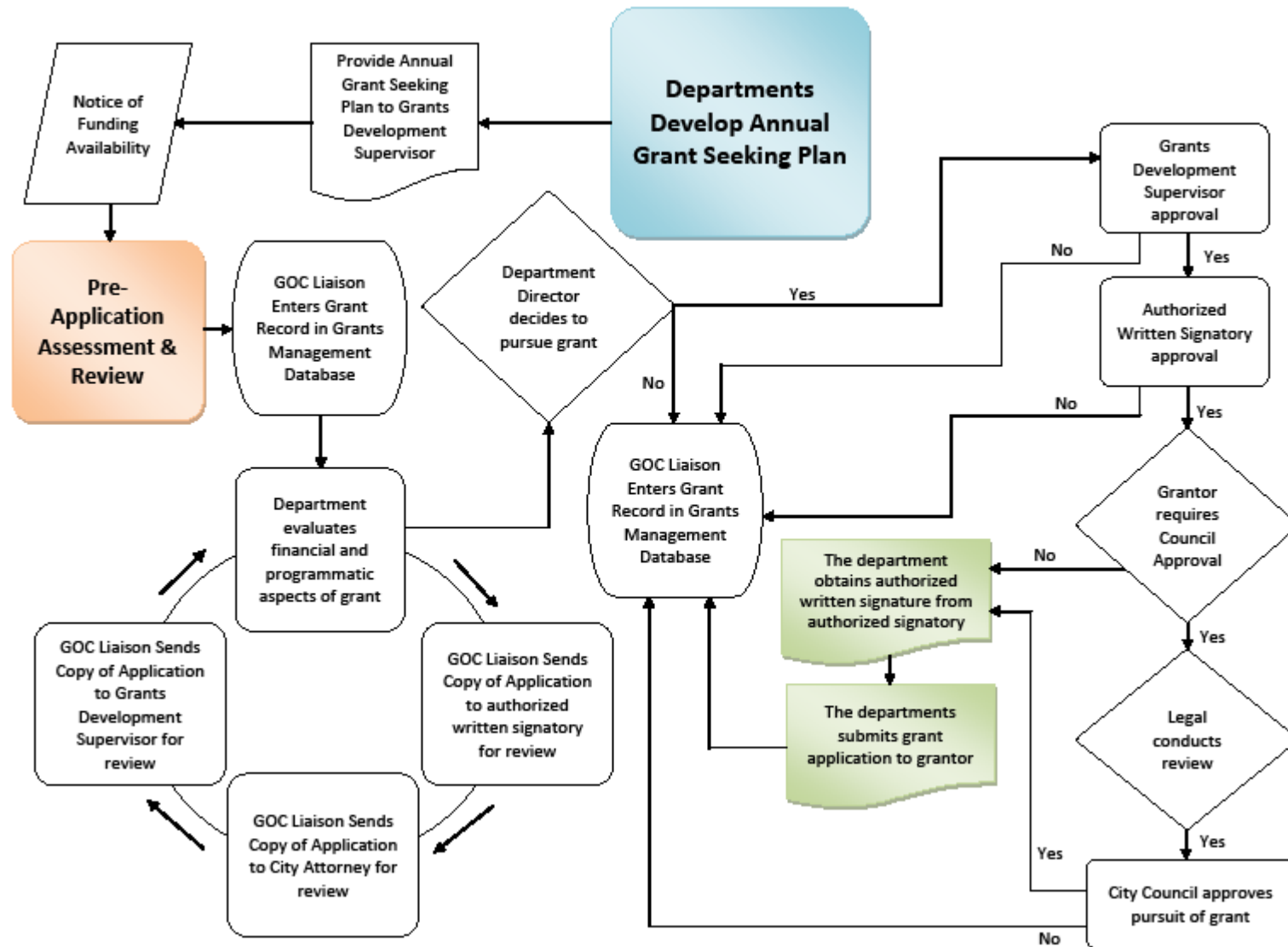
:7 REFERENCE:

Please refer to the flow charts for the Grant Seeking Process, Award Notification, Review and Acceptance and Grant Oversight and Monitoring. Procedure adopted by City Council October 15, 2007, Item A11.

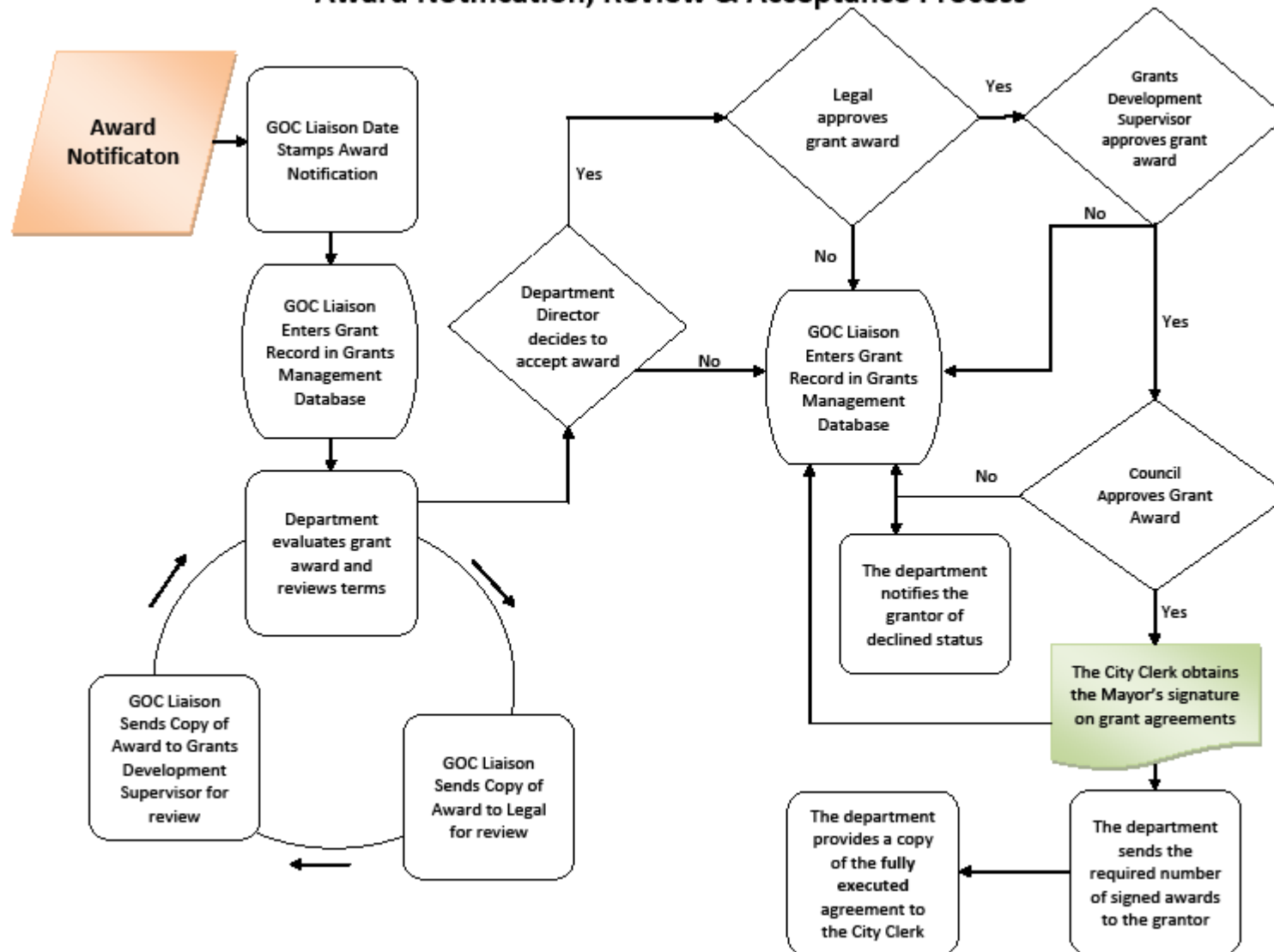
:8 EFFECTIVE DATE:

This procedure effective, October 15, 2007.

### Grant Seeking Process



### Award Notification, Review & Acceptance Process



### Transmittal of Grant Application

Name of Grant:			
Purpose of Grant:			
Date:			
Name of Initiating Department/Division/Office:			
GOC Liaison Name:		Telephone:	
<b>Pre-Application Assessment Considerations:</b>			
<p>(1) Financial</p> <ul style="list-style-type: none"> <li>• Total anticipated project cost</li> <li>• Match requirements and sources</li> <li>• Program income considerations</li> <li>• Staffing requirements (including salary and benefits increases for multi-year grants)</li> <li>• Receipt of grant funds. <i>See City Policy and Procedure 432.4, Revenue Collections.</i></li> <li>• Documentation of a clear continuation plan. <i>It is required that departments develop continuation plans (plans for sustaining grant funded programs if funding is reduced or terminated) prior to applying for grants, which reflect the potential for loss of funding and the subsequent loss of grant funded positions or program components. Departments must plan responsibly for either termination or reduction of the program or seek to secure alternative sources of funding. See City Policy and Procedure 450.3, Revenue Policy.</i></li> </ul> <p>(2) Programmatic</p> <ul style="list-style-type: none"> <li>• Alignment with City's strategic priorities and/or department's business plan</li> <li>• Provision or expansion of services to address critical needs</li> <li>• Department's capacity to administer the financial and administrative aspects of the grant</li> </ul>			
Transmittal Sequence	Authorized Approver	Signature	Date
1	Department Director	Approved By:	
2	Grants Development Supervisor	Approved By:	
3	Chief Financial Officer	Approved By:	
4	Department's Authorized Signatory <sup>1</sup>	Approved By:	
5	Department's Assigned City Attorney <sup>2</sup>	Approved By:	
6	Returned to Department GOC Liaison		

<sup>1</sup> Authorized signatories are as follows: CAO for Operating Departments, Chief of Staff for Executive Offices, Finance for Finance Department and City Attorney for the City Attorney's Office.

<sup>2</sup> The department's assigned City Attorney signature is only required if the grantor requires Council Approval prior to application submission.