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2320.1 SUBJECT: MANAGEMENT & ADMINISTRATION OF GRANTS AND OTHER TYPES OF FINANCIAL ASSISTANCE

:1 OBJECTIVE:

The purpose of these 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 and other types of financial assistance.

:2 AUTHORITY:

This procedure policy was adopted amended by City Council, Item., 7-1, May 9, 2011September 6, 2017.

: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 a clear and comprehensive set of policies and procedures.

Grants and other types of financial assistance received by the City of Orlando (the "City") support important programs and services the City provides to the community. These funds allow the City to extend pre-existing services, introduce new initiatives, gain technological advances, subsidize programmatic staffing, and support a variety of efforts, including homeland security, economic development, social services, public safety, recreation and infrastructure improvement and maintenance, among others.

Since grants and other types of financial assistance allow the City to leverage local public funds in order to extend and enhance the services it offers to the community, the impact of these funds on the community is significant, with the process of grants administration and management being a critical and important function. Furthermore, the integrity of the City is of the utmost importance, and adopting a set of policies is a key element in maintaining this integrity.

Furthermore, the integrity of the City of Orlando is of utmost importance, and adopting a set of policies is a key element in maintaining 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 grant directives, and other applicable City Policies & Procedures of Orlando-policies and procedures or contact the Grants Development Supervisor for assistance.

B. GRANTS AND OTHER TYPES OF FINANCIAL ASSISTANCE COVERED BY THIS POLICY

A grant is a type of financial assistance (in cash or kind) bestowed by a government or other organization (called the grantor) for specified purposes to an eligible recipient (called the grantee). Grants are conditional upon certain qualifications, and are bound by some type of contractual obligation as to the use, maintenance of specified standards, or a proportional contribution (cost share or match) by the grantee or other grantor(s).

In addition to grants, there are other types of financial assistance the City receives which may not include the term "grant" but are also covered by this policy. The City considers the term *grant* to include, but not be limited to, contracts or agreements that fall under the purview of 2 CFR 200 - Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards, also known as the Uniform Guidance. This circular incorporates guidance previously found in OMB Circulars A-87, A-102, and OMB-Circular A-133, and the Florida Single Audit Act, Rules of the Department of Financial Services, Chapter 69I-5, Schedule of Expenditures of State Financial Assistance.

Donations or charitable contributions are not covered by this policy and should follow the City's <u>Policies & Procedures for cash collections</u> <u>Policy & Procedure for revenue collection</u>.

Grants and other types of financial assistance that are awarded to the City are legal contracts and should also follow the applicable Policies & Procedures Policy & Procedure of the City's Office of Legal Affairs.

The following list and definitions represent several types of grants and other types of assistance typically received by the City. However, this list is not comprehensive.

 Block Grants – a broad intergovernmental transfer of funds or other assets by the U.S. Congress to state or local governments for specific activities determined largely at the recipient's discretion. Block grants are distributed according to legal formulas defining broad functional areas such as health, income security, education, transportation, etc.

- 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 Typeany grant type a continuation grant provides additional funding and/or time, subsequent to the initial budget period.
- 4. **Conditional Grant** a conditional grant involves one grantor seeking the involvement of others by making their grant conditional upon the remainder of the cost being funded from another source.
- 4.5. Cooperative Agreement 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.
- 2.6. **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.
- 5.7. Formula Grants a grant that a Federal agency is directed by Congress to make to grantees, for which the amount is established by a formula based on criteria written into the legislation and program regulations. This funding is directly awarded and administered in the Federal agency's program offices.
- 6.8. **Joint Participation Agreement** (**JPA**) A JPA is an agreement between an agency, such as the City, and a Federal or State agency that establishes a joint participation project. A JPA defines the scope, budget, funding source, responsibilities and any legal provision necessary for the project.
- 7.9. Local Agency Program (LAP) Agreement Funding provided by the Florida Department of Transportation (FDOT) when it contracts with local agencies for reimbursement to the local agencies. The local agencies use Federal funds administered by the Federal Highway Administration (FHWA) to develop, design, acquire right-of-way, and construct transportation facilities, and to reimburse these governmental agencies for services provided to the traveling public.
- 8.10. **Loans** a written agreement between the Federal or State Government and the City that outlines terms and conditions associated with a financing transaction. The agreement may indicate the obligations of each party, reporting requirements, possible sanctions for lack of borrower performance, and any restrictions placed on the borrower. Loans other than Federal or State are not covered by this policy.

- 9.11. Loan Guarantee a program bound by a Federal or State Government statute to pay part or all of a <u>loan's loan's</u> principal and interest to a lender or the holder of a security in the event of borrower default. Loan Guarantees other than Federal or State are not covered by this policy.
- 10.12. **Pass-Thruthru** of Any Grant Typeany grant type a grant originating from one grantor, but passed through another grantor or funding source.
- 11.13. **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.
- <u>12.14.</u> Transportation Regional Incentive Program (TRIP) Agreement state or municipal funds available throughout Florida to provide incentives for local governments and the private sector to help pay for critically needed projects that benefit regional travel and commerce.
- 13.15. County Grants a grant made by a County Government.
- 14.16. State Grants a grant made by the State Government, which have a corresponding Catalog of State Financial Assistance (CSFA) number. Consult the online catalog for covered classes of financial assistance.
- <u>15.17.</u> **Federal Grants** a grant made by the Federal Government, which have a corresponding Catalog of Federal Domestic Assistance (CFDA) number. Consult the online catalog for types of financial and non financial assistance.
- **16.18. Foundation Grants** a grant made by a philanthropic foundation.
- 17.19. **Corporate Grants** a grant made by a corporate foundation.
- 18.20. Workshare Agreement proceeds received and expended under an Equitable Share Agreement. Please also reference the *Orlando Police Department Policy and Procedure, Law Enforcement/Federal Asset Sharing Trust Funds*.

C. GRANTS MANAGEMENT SYSTEM

The Grants Management System is integrated within the City's financial system and is used to assist in the tracking and management of grants applied for and awarded to the City, improve coordination, enhance oversight and provide reporting of the City's grants. It is managed by the Chief Financial Officer, or their designee.

C.D. GRANT ROLES AND RESPONSIBILITIES

This The purpose of this policy establishes 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 duties that they shall perform and uphold both ethically and in the best interests of the City of Orlando.

1. Office of Business and Financial Services (OBFS)

- a) Chief Financial Officer (CFO) The CFO, or designee, has authority to approve and sign grant applications and the *Grants & Financial Assistance Approval Form* for the Office of Business and Financial Services (OBFS) and other departments, divisions or offices that report to the CFO at the time of application submission. The CFO also approves the *Grants & Financial Assistance Approval Form* for all grant applications.
- Controller The Controller, or designee, in conjunction with the OBFS Grants Unit, is responsible for the oversight of grant related financial activity. In this role, the OBFS 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.
- Controller Grants Development Supervisor, or designee, is responsible for coordinating the recording of grant applications and awards in the Grants Management System, and creating grant numbers which are used to recognize grant revenue and expenditures in the department or division's budget, maintaining this policy, reviewing requests for letters of support, ensuring that multiple competing grant application for applications from the City are not submitted to grantors, ensuring that departments track and report departmental grant activity in the Grants Management System Database, maintaining electronic signature permissions and arranging access to these systems, reviewing all grant applications to verify the considerations noted on Grants & Financial Assistance Approval Forms Form are consistent with the grant application, reviewing all grant agreements and other responsibilities indicated throughout this policy.
- d) Management & Budget Division Manager The Management & Budget Division Manager, is responsible for creating a grant fund and/or designee, isproject number, which is used to recognize grant revenue and expenditures in the department or division's budget. Each department's assigned budget analyst is also responsible for verifying the financial

considerations noted on the *Grants & Financial Assistance Approval Form.*

- e) <u>Procurement Purchasing</u> <u>Procurement Purchasing</u> issues purchase orders and other contracts for goods and services in accordance with the grant requirements supplied by the using department.
- f) Asset Management Asset Management ensures requirements for the acquisition, supervision, control, transfer and disposal of tangible personal property acquired through grants are met, and that all City property and equipment with a useful life of more thanat least one year and a per-unit acquisition cost which equals or exceeds the lesser of the capitalization level established by the City for financial statement purposes, or \$5,000 are acquired through grants are tagged and included in the Asset Management inventory regardless of the dollar value.
- **2. Grants Oversight Committee** (**GOC**) The Grants Oversight Committee is a committee comprised of liaisons from each department, designated divisions and offices. The GOC is the mechanism for communication between the <u>Assistant Controller Grants Development Supervisor</u> 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 applying for and managing grants including planning for grant acquisition, preparation and submission of grant proposals, grant writing, preparing City Council Agenda items to apply for grants when applicable and to accept grant awards, preparing budget revision requests to accept grant funds, grant orientation and review, 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 within Departments, Divisions and Offices:
 - a) **Department Director** The Department Director, or designee, approvessigns the *Grants & Financial Assistance Approval Form*, which signifies that he/she approves pursuit of the grant by the Grant Coordinator or Grant Manager noted on the *Grants & Financial Assistance Approval Form*, and that department staff have carefully reviewed the grantor guidelines and have adequately disclosed information on the form in accordance with *Directive ACL-D-2320.1* issued by the CFO Section K.2, Assess and K.3, Obtain Approval.
 - b) **Grant-Project Manager** The employee responsible for managing the program or project funded by the grant as named on the *Grants & Financial*

- <u>Assistance Approval Form and</u> in the grant application or award, or otherwise assigned by the Department Director.
- c) **Grant Coordinator** The employee responsible for coordinating a grant application <u>for submission and soliciting services from a City contracted grant writer, when needed, as named on the *Grants & Financial Assistance Approval Form*.</u>
- d) Grant Analyst The employee responsible for recording grant information into the Grant Management System and assisting the Grant Coordinator in researching funding opportunities, and the Grant Manager and Fiscal Manager with program and financial oversight.
- **Fiscal Manager** The Department's Fiscal Manager, or equivalent, is responsible for participating in grant orientation and review, monitoring expenditures and ensuring they are properly posted to the general ledger, preparing and/or reviewing and approving financial reports as outlined in *Section L.4M*, which include quarterly reports submitted to the grantor, expenditure reports and other reports as requested.
- d)f) 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 Assistant Controller. 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 <u>Assistant</u> <u>Controller, Grants Development Supervisor,</u> GOC meetings and received communications to all staff with grant responsibilities in their department.
 - (2) <u>ServesServe</u> as the conduit for grant related ideas and information from the department back to the <u>Assistant ControllerGrants</u> <u>Development Supervisor</u> and GOC.
 - (3) Have the authority to communicate with department staff, and obtain necessary approvals and signatures as required by this policy.
 - (4) Ensure the applicable grants management and administration policies are followed within the department.
 - (5) Ensure their department's grant activity is entered into the Grants Management <u>Database System</u> 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.
- **4. City Attorney's Office** Prior to <u>application submission</u> City Council consideration, the City Attorney's Office shall conduct a legal review of grant applications when required, and subsequent agreements or contracts <u>shall be reviewed by the City Attorney's Office prior to City Council consideration.</u>

 The City Attorney or designee has authority to approve and sign grant applications and the *Grants & Financial Assistance Approval Form* for the City Attorney's Office and other departments, divisions or offices that report to the City Attorney at the time of application submission.
- 5. Chief Administrative Officer (CAO) The CAO, or designee, has authority to approve and sign grant applications and the *Grants & Financial Assistance Approval Form* for City operating and other departments, divisions or offices that report to the CAO 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 shall submit the application when internal competition for a grant application cannot otherwise be resolved, to obtain approval to submit multiple applications to a grantor, or to determine whether a request for a letter of support should be provided in support of an external organization that may compete with City's grant application to the same grantor.
- **6. Chief of Staff** The Chief of Staff, or designee, has authority to approve and sign grant applications and the *Grants & Financial Assistance Approval Form* for the Executive Offices and other departments, divisions or offices that report to the Chief of Staff at the time of application submission.
- 7. Mayor The Mayor², or designee, signs grant agreements which have been approved by City Council and delivered for signature by the City Clerk.

D.E. 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. Any officer or employee 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, or
 - e) Affecting adversely public confidence in the grant-funded program in particular, and the City in general.
- 3. In addition to any other ethics rules or standards of conduct established by the City, no employee, officer or agent of the City, shall participate in the selection, or in the awarding, or administration, of a contract supported by federal funds if a conflict of interest, real or apparent, would be involved.

 Such a conflict would arise when:
 - a) The employee, officer or agent;
 - b) Any member of his <u>or her</u> immediate family;
 - c) His or her partner; or
 - d) An organization which employs, or is about to employ, any of the above, has a financial or other interest in <u>or a tangible personal benefit from athe</u> firm <u>considered selected</u> for <u>a contract or</u> award. Subject to the monetary amounts set forth in the City's Ethics Policy, the City's officers, employees or agents (and the City's subgrantees' officers, employers or agents) will neither solicit nor accept gratuities, favors or anything of monetary value from contractors <u>or parties to subcontracts</u>, potential contractors, or parties to subagreements.
- 4. Organizational Conflicts of Interests in Federally Funded Procurements: An organizational conflict of interest exists where there is a relationship between a bidder or other potential contractor and the City which is equivalent to that of a parent company, affiliate, or subsidiary organization. In such cases, the entity having an organizational conflict of interest with the City should not be awarded a contract by the City without guidance and/or approval from the federal awarding agency. At a minimum, for quotes and formal solicitations, the entity having an organizational conflict of interest should not have participated in the preparation of the City's specifications for the quote or solicitation and should meet all material requirements applicable to other eligible respondents.

Any violation of these provisions are governed by the City's Ethics Policy.

E.F. 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. 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 and provided to the Assistant
ControllerGrants Development Supervisor
before being provided to the requesting organization. The Assistant ControllerGrants Development Supervisor
should determine whether the City is not in competition, or is likely to be in competition, for the same grant opportunity and will notify the Department's Authorized Signatory and the-requesting Department Director. The Department's Authorized Signatory as defined in Section GH, Authorized Signatory as defined in Section GH.

Letters of support should be signed by the Department's Authorized Signatory as defined in Section GH.

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 cycle. 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 contact the grantor's program manager in writing to determine if the grantor permits multiple submissions, and to inform their department or division's GOC Liaison and the Grants Development Supervisor of the grantor's response.
- 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 shall present the competing applications to the CAO for consideration.
- 4. The CAO, in consultation with the CFO, shall determine which department(s) shall submit the application. [TC1]

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 managed by the Grants

Development Supervisor. This section shall describe the use of the Grants-Management Database (regardless of the type of software that is used) and establish the responsibilities for entering the required grant related data. [TC2]

GRANTS MANAGEMENT DATABASE PROCEDURE

- 1. All City staff must immediately report <u>all grant activity</u> 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 any 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 application cycle, the GOC Liaison must notify the Grants Development Supervisor. The Grants Development Supervisor shall then resolve any potential conflicts in accordance with Section F, Internally Completing Applications, of this policy.
- 4. If no record of the same grant opportunity exists within the same grant year or eycle, the GOC Liaison shall create the initial grant record.
- 5. Unless otherwise determined by the Department Director or designee, and communicated to the Grants Development Supervisor via email, data entry responsibilities are as follows:
 - a) GOC Liaison is responsible for creating the initial grant record, ensuring a grant conflict with other departments does not exist, verifying that the application, award and quarterly reports are uploaded by grantor due dates.
 - b) Grant Coordinator is responsible for uploading the documents required during the pre-award phase.
 - c) Grant Project Manager is responsible for uploading the documents required during the award phase and closeout, and is ultimately responsible for ensuring the grant record is current and complete. [TC3]

H.G. AUTHORIZED SIGNATURE AUTHORITY

The purpose of this policy is to identify who may approve and provide authorized written or electronic signatures on letter requests, grant applications, letters of support, and subsequent grant agreements, in conjunction with <u>Directive, ACL-D-2320.1</u> issued by the CFOSection K.4, *Pre-Award Phase*. Obtaining approval signatures shall be done well in advance of grantor due dates to avoid last minute delays or problems that could cause grantor deadlines to be missed.

1. 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 and the *Grants & Financial Assistance Approval Form* for City operating departments and other departments, divisions or offices that report to the CAO.
- b) Chief Financial Officer The CFO, or designee, is authorized to approve and provide authorized written signature on grant applications and the Grants & Financial Assistance Approval Form for the Office of Business and Financial Services and other departments, divisions or offices that report to the CFO.
- c) Chief of Staff The Chief of Staff, or designee, is authorized to approve and provide authorized written signature on grant applications and the *Grants & Financial Assistance Approval Form* for the Executive Offices and other departments, divisions or offices that report to the Chief of Staff.
- d) City Attorney The City Attorney, or designee, is authorized to approve and provide authorized written signature on grant applications and the Grants & Financial Assistance Approval Form for the City Attorney's Office and other departments, divisions or offices that report to the City Attorney.
- 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. [TC4]
- 2. Authority over a specific grant project or program, grant application or grant agreement may be delegated to the Department Director through the approval of the Grants & Financial Assistance Approval Form in the Grants Management Systemin writing to address circumstances that warrant delegation or provide efficiency.
- 3. 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. USE OF WEB-BASED GRANT SYSTEMS & ELECTRONIC SIGNATURE

Many grantors offer the option, or have a requirement for using a web based system accessed via the internet to perform a variety of functions such as: applying for funding, executing awards, submitting reporting through the internet and drawing down funds. The purpose of this policy is to identify permissible users of such systems and the procedure of obtaining permission for authorized electronic signatures from those who have authorized signature authority.

USE OF WEB BASED GRANT SYSTEMS & 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 Department Director shall send an email to the Grants Development Supervisor requesting and/or notifying permissible users and their roles as applicable, including the staff with designated authority to submit electronic grant applications on behalf of the Department. 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.
- 3. The individuals with designated authority to submit electronic grant applications on behalf of the Department must obtain formal delegations in writing from the authorized signatories noted in Section H, whenever an application will be submitted electronically. The letter of designation should be placed in the master grant file.
 - 4. The Grants Development Supervisor shall ensure that properaccess to these systems have been enabled for the designated staff person(s).
 - 5. The Grants Development Supervisor shall confirm authorized signature status with the Department Director, GOC Liaison and Department's Authorized Signatory upon completion. [rcs]

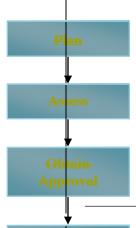
J.H. D-U-N-S NUMBER

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

- 1. The Office of Business and Financial Services has the <u>sole responsibility</u> of managing and <u>renewingobtaining D-U-N-S numbers for</u> the City of <u>Orlando's registration with Orlando from</u> the <u>U.S. federal government's Government's System for Award Management (SAM). Central Contractor Registry.</u>
- 2. The city of Orlando's D-U-N-S number can be obtained by contacting Contact your department or division's GOC Liaison, Fiscal Manager or Assistant Controller, or searching SAM.gov.Grants Development Supervisor to obtain the City of Orlando's D-U-N-S number.

K. PRE AWARD PHASE

In order to coordinate the City's grant activities effectively, the Grants Development Supervisor must have knowledge of each Department's annual grant plan. Similarly, Departments must also be aware of the impact of a grant's programmatic, financial, legal and procurement requirements in order to adequately budget and plan. This knowledge will allow the Grants Development Supervisor and Departments to identify parallel or redundant submissions, areas for potential collaboration, cyclical grant opportunities, and be pre-positioned to submit proposals as opportunities arise.



Submitpplication The pre-award phase does not apply to Workshare Agreements, as defined in Section B.20.

The pre-award phase has four components: (1) plan, (2) assess, (3) obtain approval and (4) submit application.

1. PLAN

The purpose of this policy is to promote a strategic approach to grant seeking, enhance the Grants Development Supervisor's ability to coordinate grant activity on a Citywide basis, and assist Departments with their annual budget planning with regard to anticipated grant matches or cost sharing requirements. [TC6]

ANNUAL GRANT PLANNING PROCEDURE

- a) Each City department must develop an annual grant plan which shall include a prioritized list of grantors that can potentially meet the Department's needs for funding.
- b) These needs shall be in alignment with the City's priorities.
- c) The Department Director shall submit an annual grant plan to the Grants Development Supervisor by the close of each calendar year in preparation for the annual budget process. [TC7]
- d) The department is responsible for updating and maintaining their grantplan throughout the year.

2. ASSESS

The purpose of this policy is to encourage the pursuit of grant opportunities that support the City's s priorities, while ensuring that the impact of programmatic, financial, legal and procurement requirements on the department are thoroughly evaluated before applying for a grant.

ASSESSMENT PROCEDURE

The following considerations shall be used as the basis of evaluation to determine whether a department should pursue grant funding. These considerations should be carefully evaluated as opportunities for funding arise throughout the year, and while preparing and/or updating department grant plans.

Once the department has decided to pursue the grant, responses to these considerations should be recorded on the *Grants & Financial Assistance*Approval Form, and routed for approval as indicated on the form. Obtaining approval to apply for a grant via the *Grants & Financial Assistance Approval*

Form should be done well in advance of the grantor's application submission due date and City Council due dates (when required) to avoid last minute delays or problems that could cause the grant deadline to be missed. [TC8]

a) Programmatic Considerations

- (1) How does the proposed project align with City's priorities and department's core services? Provide a short description that fully justifies how the proposed project or program aligns with the City's priorities. Carefully consider why the department wants to pursue the grant and whether this project, program and/or grant aligns with the department's core services.
- (2) Does the proposed project provide or expand essential services to address critical needs? Provide a short description of how the proposed project or program provides or expands essential services that address critical needs.
- (3) Does the proposed project impact other City departments? Provide a short description of how the proposed project or program involves the commitment of, or impacts other City departmental resources (budgetary, staff, maintenance, real estate acquisition, etc.).
- (4) Does the applying department have the capacity to manage the project? Provide a short description of the department's ability to manage the project.
- (5) Does the applying department have the capacity to administer the financial and administrative aspects of the grant? Provide a short description of the department's ability to manage the financial and administrative aspects of the grant. This includes reviewing the grant agreement (if awarded), compliance with spending within the period of performance, submitting reports required by the grantor, etc.
- (6) Is this a collaborative effort with an external organization? If so, cite the name of the collaborating organizations(s) and the nature of the collaboration.

b) Financial Considerations

- (1) What is the total anticipated project cost?
- (2) How much does the Department anticipate receiving from the grantor? If not receiving cash, include the value of property, equipment, or services.

- (3) What are the match or cost share requirements and sources? If applicable, identify 1) the dollar amount or value of match 2) the type of match (cash, in-kind, etc.) and 3) the funding source(s) of the match.
- (4) If applicable, identify the amount and funding source(s) that support the remainder of the project or program cost.
- (5) Will the grant be used to fund salaries, wages or benefits and other associated personnel costs? Provide a short description of the salaries, wages or benefits and other associated personnel costs (computer, vehicle, etc.) that will be funded by this grant.
- (6) Will the receipt of this grant cause the City to incur additional or future operating costs? Provide a short description of the additional or future operating costs that will be incurred as a result of this project or program. Additional or future costs would include, but not be limited to the required replacement of assets purchased with grant funds. If assets are to be purchased with grant funds and the grant requires that the assets are replaced with City funds, this must be identified as a future cost.
- (7) What is the Capital Improvement Project (CIP) number and/or financial project number associated with this project? Identify the CIP number and financial project number associated with this project. If it is not on the current CIP list, please explain why it is not on the list and when/how the department's plan will be amended.
- (8) Will this program or project generate revenue? If so, please describe the permissible use(s) and confirm whether these uses are consistent with the terms of the grant program or project.
- (9) Is supplanting allowed? Provide a short description of the supplanting guidelines for this grant or type of financial assistance.
- (10) Does the grantor require any special ways to manage the receipt of grant funds? Provide a short description of the way the grant funds should be managed as described in the grant guidance.
- (11) Does the grant require continuation of the project or program beyond the grant period of performance? Provide a short description of what must be retained or sustained, the duration of the continuation beyond the grant period of performance, and specifically identify how the required continuation will be funded.
- c) Legal Considerations

(1) Provide a short description of unique contract requirements that the City Attorney needs to be made aware of, or needs to clarify for the Department before the Department applies for the grant.

d) Procurement Considerations

- (1) Provide a short description of any special procurement requirements that need to be disclosed and evaluated at the time of application.
- (2) Does the receipt of the grant involve the lease or purchase of real estate? If so, please describe the real estate need and include the Real Estate Division Manager. [TC9]

3. OBTAIN APPROVAL

- a) Approval to submit an application, earmark request, letter of inquiry, or concept paper to a grantor, elected official, local or regional task force, board or committee shall be obtained via the Grants & Financial Assistance Approval Form. If the Grants & Financial Assistance Approval Form is approved, the department may pursue the grant. If it is not approved, the department may not pursue the grant and must update the grant record in the Grant Management Database.
- b) The Department may submit an application, earmark request, letter of inquiry, or concept paper to a grantor, elected official, local or regional task force, board or committee to the grantor without first obtaining approval via the Grants & Financial Assistance Approval Form, with the concurrence of the Department's Authorized Signatory and CFO via an email notification to the Grants Development Supervisor and the. However, the Department must still obtain approval via the Grants & Financial Assistance Approval Formafter application submission. If pursuit of the grant is disapproved after it is submitted to the grantor, the Department must send a letter from the Department Director to withdraw their application.

3.1 DUE DATES

- a) APPLICATIONS THAT REQUIRE CITY COUNCIL APPROVAL: begin routing the *Grants & Financial Assistance Approval Form* by the date indicated on the City Clerk Agenda Item Calendar.
- b) APPLICATIONS THAT DO NOT REQUIRE CITY COUNCIL APPROVAL: begin routing the *Grants & Financial Assistance Approval Form* a minimum of ten full business days before the grantor due date.
- e)a) Exceptions to a) and b), and permission for c) must be requested by the Department and approved by the Department's Authorized Signatory, via an email to the Grants Development Supervisor and the Controller.

3.2I.GRANTS & FINANCIAL ASSISTANCE APPROVAL FORM ROLES

- Lead-Department Director(s) the Department Director must approve pursuit of the grant opportunity and all programmatic, legal, fiscal and procurement considerations recorded on the *Grants & Financial Assistance Approval Form.*Approval The signature of the Department Director(s) signifies that he/she approves pursuit of the grant, departmental resources will be committed to manage the grant project as indicated, grantor guidelines have been carefully reviewed, and the Department has adequately disclosed information on the form in accordance with *Directive*, ACL-D-2320.1 issued by the CFO. Also, the approval signifies that the Grant Coordinator or Grant Manager is designated authority to submit electronic grant applications on behalf of the Department Section K.2, Assess.
 - b) Impacted Department Director(s) the Impacted Department Directorapproves the commitment of department resources indicated on the *Grants & Financial Assistance Approval Form*. The signature of the Impacted Department Director(s) signifies that he/she will commit departmental resources to the project as indicated, grantor guidelines have been carefully reviewed, and the Lead Department has accurately disclosed information on the form in accordance with *Section K.2, Assess*.
- e) Budget Division Manager Lead Department's Assigned Budget Analyst—the lead Department's-Budget Division Manager Analyst must verify the financial considerations noted on the Grants & Financial Assistance Approval Form.

 Approval of the In the case where more than one Department is impacted, the lead Department's Budget Division Manager, or designee, Analyst shall confer with the other Department's budget analysts. The signature of the Department's Budget Analyst signifies that he/she has verified the financial considerations noted on the Grants & Financial Assistance Approval Form.
- d) Department's Assigned City Attorney in circumstances where legal review is required at the time of application submission, according to Section K.4.1., the Department's Assigned City Attorney shall review the legal considerations noted on the Grants & Financial Assistance Approval Form and the grant application for and related conditions, certifications and assurances that become binding, or are likely to become binding if the grantor funds the application, and determine if City Council approval is required. Also, the Assigned City Attorney will assess whether the terms and conditions of the application are legally enforceable to ensure the City's interests are protected prior to the department's submission of an application, when required, a council agenda item to apply for grant funds. However, it is the Department's responsibility to fully understand, and comply with the terms and conditions of applications and awards.
- e) **Department's Authorized Signatory** the Department's Authorized Signatory (as defined in *Section GH*) must approve pursuit of the grant opportunity and all programmatic, legal, fiscal and procurement considerations recorded on the

Grants & Financial Assistance Approval Form. The Department's Authorized Signatory's approval signifies the project is feasible from an operations perspective, and is in alignment with the City's operational priorities. Also, the approval signifies that the Department Director is designated authority to submit electronic grant applications on behalf of the Department, as well as, provide authorized written signatures on grant applications.

Grants Development Supervisor Assistant Controller – the Assistant

Controller – The Grants Development Supervisor confirms the grant is recorded in the Grants Management System accurately by the Grant Analyst by reviewing the Database and reviews grantor guidelines and completed grant applications, and ensuring to ensure the considerations and application is consistent with the Department's responses on the Grants & Financial Assistance Approval Form, and that considerations on the Grants & Financial Assistance Approval Form have been adequately disclosed and addressed by the Department.

The Grants Development Supervisor shall inform the Grant Coordinator via email if changes need to be made to the grant application before it can be submitted. If the Grants Development Supervisor cannot resolve outstanding issues with the Grant Coordinator, the Grants Development Supervisor shall notify the Department Director, and the Department's Authorized Signatory if necessary, to resolve the identified issues before the grant application is submitted.

Chief Financial Officer – the CFO, or designee, must approve pursuit of the grant opportunity and all programmatic, legal and fiscal considerations recorded on the *Grants & Financial Assistance Approval Form*. The CFO's approval signifies the project is feasible from a financial perspective, and is in alignment with the City's financial priorities.

4. SUBMIT APPLICATION

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, has matching funds available if required by grantor, and programmatic, financial, legal and procurement requirements have been fully disclosed and evaluated. A flow chart depicting this process is included at the end of this policy.

J. APPLICATIONS THAT REQUIRE CITY COUNCIL APPROVAL

- 4.1 -A Grantgrant application will need City Council approval when:
- (1)1.Fundingfunding has been earmarked or set aside through a similar process such as a local or regional task force, board or committee recommendation, where the

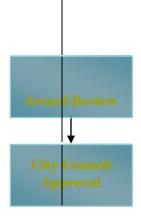
- application process is generally a formality used to enter into a grant agreement that will ultimately bind the City upon grantor acceptance;
- (2)2.Conditions conditions, certifications and assurances contained in the grant application become binding, or are likely to become binding if the grantor funds the application;
- 3. The Mayor's signature is required on the grant application.
- (3)4. City Council approval is required by the grantor, City Code, or City Policies & Procedures at the time of submission; or
- (4)<u>5. Asas</u> recommended by the <u>Assistant Controller Grants Development Supervisor</u>, and approved by the Department's Authorized Signatory.
- 4.2 PROCEDURE FOR GRANT APPLICATIONS THAT REQUIRE CITY COUNCIL APPROVAL
- 4.2.1 Request that your department's GOC Liaison enter the grant record in the Grant Management Database to ensure a conflict with other department does not exist. If a conflict exists, refer to Section F, Internally Competing Applications.
- 4.2.2 Evaluate programmatic, financial, legal and procurement considerations of grant opportunity and determine the date the grant application needs to be City Council Agenda.
- 4.2.3 Submit blank grant application and guidelines to the Department's Assigned City Attorney by the date indicated on the City Clerk Agenda Item Calendar, pursuant to K.3.1.a, Applications That Require City Council Approval.
- 4.2.4 Complete and route the *Grants & Financial Assistance Approval Form* by the date indicated on the City Clerk Agenda Item Calendar for approval to pursue grant. The Grants Development Supervisor must receive the form no later than the noon PA deadline on the City Clerk Agenda Item Calendar that corresponds with the date of the City Council the Department is targeting.
- If the *Grants & Financial Assistance Approval Form* is approved, the department may pursue the grant. If it is not approved, the department may not pursue the grant and the GOC Liaison must update the grant record in the Grant Management Database.
- 4.2.5 Begin writing the grant application or request the Grants Development
 Supervisor enter a purchase requisition to begin working on grant application
 with contracted grant writer.

- 4.2.6 Create a Council Agenda Item to obtain City Council approval with enough time to meet the grantor's application due date. For the purposes of this approval, grant applications do not need to be complete at this time, since the request to City Council is to approve pursuit of the grant application, subject to review and approval of the City Attorney and Grants Development Supervisor. The agenda item should be accompanied by the grant application, any other required documentation, and the Recommended Action which should describe the required Council action.
- 4.2.7 Submit the completed grant application to the Grants Development Supervisor a minimum of five full business days before the grantor due date for review and return to the department. However, it is advisable to submit initial drafts as early as possible.
- 4.2.8 Request the City Clerk obtain the Mayor's signature OR obtain signature delegation from the Mayor if the grant application requires electronic signature as indicated in the Recommended Action section of the Council Agenda. The department must ensure the City Clerk has the required amount of grant applications ready for the Mayor's signature, which is two applications with original signatures for the City's files (one to the City Clerk and the other for the master grant file) and additional applications with original signatures that the grantor will retain. Each location that requires a signature or initial shall be clearly labeled with a "sign here" or "initial here" label.
- 4.2.9 Verify that proper signatures have been obtained and submit the grant application to the grantor by the grant application due date. It is the department's responsibility to ensure that proper signatures have been obtained and the grant is submitted to the grantor on time.
- **4.2.10** Update grant record in Grants Management Database. The grant coordinator shall update the Grant Management Database with application documents.
- **4.2.11 Verify grant record in Grants Management Database.** The GOC Liaison shall verify the grant record in the Grants Management Database has been updated.
- 4.3 PROCEDURE FOR GRANT APPLICATIONS THAT DO NOT-REQUIRE CITY COUNCIL APPROVAL
- 4.3.1 Request that your department's GOC Liaison enter the grant record in the Grant Management Database to ensure a conflict with other departments does not exist. If a conflict exists, refer to Section F, Internally Competing Applications.
- 4.3.2 Evaluate programmatic, financial, legal and procurement considerations of grant opportunity.
- 4.3.3 Complete and route the *Grants & Financial Assistance Approval Form* a minimum of ten full business days before the grantor due date for approval to

- pursue grant. The Grants Development Supervisor must receive the form five fullbusiness days before the grantor due date.
- If the *Grants & Financial Assistance Approval Form* is approved, the department may pursue the grant. If it is not approved, the department may not pursue the grant and the GOC Liaison must update the grant record in the Grant Management Database.
- 4.3.4 Begin writing the grant application or request the Grants Development Supervisor enter a purchase requisition to begin working on grant application with contracted grant writer.
- 4.3.5 Submit the completed grant application to the Grants Development Supervisor a minimum of five full days before the grantor due date for review and final approval. However, it is advisable to submit initial drafts as early as possible.
- 4.3.6 Obtain the Department's Authorized Signatory's signature as indicated in Section H, Authorized Signature Authority after the Grants Development Supervisor has approved the grant application OR obtain signature delegation from the Department's Authorized Signatory if the grant application requires electronic signature. Grant applications must be clearly labeled at each location that requires a signature with a "sign here" label. The department must ensure they have the required amount of grant applications ready for the Department's Authorized Signatory's signature, which is one application with original signatures for the City's files (for the master grant file) and additional applications, as specified by the grantor, with original signatures that the grantor will retain. Each location that requires a signature or initial shall be clearly labeled with a "sign here" or "initial here" label.
- 4.3.7 Verify that proper signatures have been obtained and submit the grant application to the grantor by the grant application due date. It is the department's responsibility to ensure that proper signatures have been obtained and the grant is submitted to the grantor on time.
- **4.3.8 Update grant record in Grants Management Database.** The grant coordinator shall update the Grant Management Database with application documents.
- **4.3.9** Verify grant record in Grants Management Database. The GOC Liaison shall verify the grant record in the Grants Management Database has been updated. [TC11]

B.K. MANAGING AWARDS

Grant funds shall not be disbursed or expended until a council agenda item has been approved by City Council, the award document is signed by both the grantor and the City's authorized signatory, a grant has been established record in the Grant Management System in the appropriate fund, and a budget revision request has been scheduled on the next available Budget Review Committee meeting.



C. AWARD PHASE

Grant agreements are legal contracts and are subject to all applicable City Policies & Procedures and City Code, including City Council Approval for all contracts and agreements (see City's Office of Legal Affairs Policy & Procedure 161.3).

Departments carry a significant legal and ethical responsibility when accepting and managing grant funding and are responsible for thoroughly reviewing and ensuring it can comply with the terms and conditions of a grant agreement and other award documents before accepting an award. It is the Department's responsibility, through the Grant Project Manager, 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.

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.

:2 PROCEDURE FOR AWARD REVIEW

Grant funds shall not be disbursed or expended 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 the award document is signed by both the grantor and the Mayor. [TC12]

- 1.1 Grant Project Manager shall forward a copy of the award notification, the grant agreement or contract, and any memoranda of understanding to the Grants Development Supervisor and the Department's Assigned City Attorney within two days of receipt to ensure adequate time for review.
- 1.2 The Grant Project Manager must review the grant agreement to ensure the Department can comply with the terms of the agreement, and consult with the Department's Assigned City Attorney to clarify terms as necessary. The Grant Project Manager is responsible for ensuring that legal review and City Council approval to accept the award is completed by the date required by the grantor for full execution.

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.

1.3 Grant Project Manager and Department's Assigned City Attorney ensure terms are acceptable to the Department and the City, and negotiate with grantor as necessary. 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. However, it is the Department's responsibility, through the Grant Project Manager, to ensure it fully understands and can comply with the terms of the agreement.

If the department and legal review identifies any potential contractual or legal issues that need to be amended before the grant agreement can be accepted, the submitting department and the Department's Assigned City Attorney must contact the granting entity and seek to resolve the issue.

Changes to the grant agreement must be in writing.

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.

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. [TC13]

:3 PROCEDURE FOR ACCEPTING AN AWARD

The purpose of this policy is to ensure that acceptance and execution of each grant awarded to the City is formally authorized by City Council and signed by both the grantor and the Mayor before any funds from the granting entity are appropriated or expended. Funding must also be recognized, allocated, and approved by City Council using the City Policy & Procedure for budget revision requests.

- **2.1Prepare a Council Agenda Item to accept award.** The department receiving the grant must prepare a Council agenda item and fiscal impact statement and submit it for Council approval within the timeframe necessary to meet the grantor's due date.
 - The agenda item must be accompanied by the award letter, grant agreement, and any other documents required for execution.
 - Include the fiscal year of the funding award, grantor name, granting agency or office name (if any), grant name and the date the grant agreement either was, or is to be approved by City Council, should be included in both the Fiscal & Efficiency Data section of the Paperless

Agenda, and in response to question #3 of the Fiscal Impact Statement-like this: FY 2007 Department of Justice, Bureau of Justice Assistance, Edward Byrne Memorial Justice Assistance Grant (JAG) was / to be approved by City Council on June 18, 2007.

- Include appropriate instructions in the Recommended Action to accept an award like this: Accept the grant award, authorize the Mayor to execute the agreement with [NAME OF GRANTOR] subject to review and approval by the City Attorney's Office and the Grants Development Supervisor.
- 2.2 City Council approves acceptance of grant award.
- 2.3Request the City Clerk obtain the Mayor's signature on grant documents as indicated in the Recommended Action section of the Council Agenda. The department must ensure the City Clerk has the required number of grant agreements ready for the Mayor's signature, which is two awards with original signatures for the City's files (one to the City Clerk and the other for the master grant file) and additional awards with original signatures that the grantor will retain. Each location that requires a signature or initial shall be clearly labeled with a "sign here" or "initial here" label.
- 2.4Verify that proper signatures have been obtained and submit the grant agreements to the grantor by the grantor due date. It is the Grant Project Manager's responsibility to ensure that proper signatures have been obtained and returned to the grantor on time.
- 2.5 Provide a fully executed agreement (signed by the grantor and the Mayor) with original signatures to the City Clerk's Office when the fully executed grant agreements are returned to the City by the grantor. The department retains the second fully executed agreement with original signature in the grant master file.
- 2.6Update grant record in Grants Management Database. The grant project manager shall update the Grant Management Database and the GOC Liaison shall verify the grant record in the Grants Management Database has been updated.
- **2.7Fiscal Manager submits a budget revision request to the Management and Budget Division** to add the grant award to the department's budget.
- 2.8 Budget Review Committee (BRC) approves Budget Revision request.
- 2.9 City Council approves acceptance of BRC Minutes.

2.10 Department can begin expending grant funds once City Council has approved BRC Minutes and Department has received the fully executed grant agreement back from the grantor.

[TC14]

M. IMPLEMENTATION PHASE

:1 Managing Awards

The purpose of this policy is to ensure that grant funds are properly managed, which may include the use of grant funds received by the City of Orlando, and in some circumstances, the return of funding to the grantor. Violations for the mismanagement of grant funds 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.

Grant requirements should be read and interpreted in conjunction with all other grant administration requirements. When there is more than one consistent grant requirement, the more specific requirement should govern. When grant requirements are inconsistent, the following Order of Precedence should be followed unless there is no built in waiver of precedence, deference to other requirements or specified terms and conditions of the award.

a)1. Order of Precedence

The order of precedence for grants and other types of financial assistance is as follows: 1) Federal <u>StatuesStatutes</u> 2) Government Directives (such as Presidential Executive Orders and <u>2 CFR 200)OMB-Circulars</u> 3) Administrative Regulations 4) Program Regulations 5) Award Terms & Conditions 6) City Policies <u>& Procedures</u>.

b)2. Allowable Costs

Grant Managersproject managers are ultimately responsible for adherence to the stipulations outlined in the approved grant agreement, and ensuring that allowable expenditures are incurred. This means that they are allowable, allocable, necessary and reasonable and provide a direct benefit to a grant-funded project.

e)3. Revenue

- 1. Grant funds shall not be disbursed or expended 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 the award document is signed by the grantor and the Mayor.
- 2. Any expenditure for the grant made prior to the grant project being established, and the BRC minutes or attached resolution being approved by City Council, is strictly prohibited.

- (1) All departments receiving grant funds shall adhere to City Policy & Procedure for revenue collection.
- (2)a) All departments receiving grant funds and income resulting from a-grant-funded projects shall-should follow adhere to the City's Revenue Policies & Procedures Policy & Procedure for cash collections and be managed and maintained as established in the award letter, grant agreement, contract, special conditions, or other document generated by the federal government, state government or granting entity.
- designee, for the purpose of inclusion on the annual *Schedule of Expenditures* of Federal Awards and State Financial Assistance (SEFA) as outlined in Section LM-2.2, Accounting and Reporting of Grants. Grants and other types of financial assistance required to be included on the SEFA are listed in the Catalog of Federal Domestic Assistance (CFDA) or the Catalog of State Financial Assistance (CSFA), both of which can be accessed via the internet.

<u>d)4.</u> Budget

- (1)a) 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 Policies & Procedures Policy & Procedure for budget modifications and grantor requirements.
- a)b) All grant and any related matching fund revenues and expenditures shall be recorded in the appropriate grant and the accompanying matching grant in the Grant Management System. grant project. Any revenues or expenditures that occur in another cost centerprogram/project that are applicable to a grant or that are used as a match shall have a journal entry (JE) made to record the revenues or expenditures in the appropriate matching grant project with a detailed explanation, including original general ledger date and other relevant batch information. Revenues received shall not be deposited into an expenditure account unless an item purchase purchased was returned.

e)5. Supplanting

Grant funds awarded to the City of Orlando may 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.

6. Procurement

B. Purchasing

(1)a) All procurement activity associated with grant-funded projects shall follow <u>Directive</u>, <u>PUR-D-1301 Federal</u>the same procurement rules and <u>State</u>

<u>Grant Procurement</u>procedures as required with non-grant-funded projects (i.e., the City Code, specifically the <u>Chapter 7 Purchasing Code</u>; City Purchasing Policies & Procedures; and other applicable City, State, and Federal procurement guidelines.).

- Moreover, any department that applies for and utilizes grant funds is also responsible for supplying the ProcurementPurchasing Division with any and all additional grant requirements with respect to the purchase of those grantfunded goods and services when completing a purchasing requisition. These requirements shall include not only the detailed descriptions, specifications, terms, and conditions of the goods and services, but also all other grant mandates and compliance issues needed in the procurement process.
- 1. Prior to the procurement of any contract which will be paid in part or in whole with State or Federal funds, the City Department requesting the procurement will provide for a review of the proposed procurement to avoid purchase of unnecessary or duplicative items._
 - Consideration will be given to consolidating or breaking out procurements to obtain a more economical purchase. Where appropriate, an analysis will be made of lease versus purchase alternatives, and any other appropriate analysis to determine the most economical approach.

<u>197.</u> Asset Management

Asset Management ensures requirements for the acquisition, supervision, control, transfer and disposal of tangible personal property are met. All property and equipment (including information technology systems) havingwith a useful life of more thanat least one year and a per-unit acquisition cost which equals or exceeds \$5,000 acquired or received through grant funds shall follow the procedures outlined in City's Policy & Procedure for property control, except that all City property and equipment with a useful life of at least one year and acquired through grants are tagged and included in the Asset Management inventory. Refer to the regardless of the dollar value. The definition of property and equipment acquired through grants at 2 CFR 200 (Uniform Guidance). is at the discretion of the Controller or designee.

g)8. Terminating an Award

In the event a grant agreement needs to be terminated after an award has been made to the City, but before the period of performance ends, the Department Director from the recipient department must prepare a letter to the granting entity declining the award. A draft of the letter must be provided to the <u>Assistant ControllerGrants Development Supervisor</u>, who shall route it to the Chief Financial Officer and the Department's Authorized Signatory as defined in *Section GH*, *Authorized Signature Authority*, for approval before the letter and funding is returned to the granting entity. The letter should clearly articulate the

specific reason(s) the award is being returned. If a budget has been established in the City's financial system, the Department shall also initiate grant closeout and receive approval to closeout with the City and the grantor in accordance with *Directive*, *ACL-D-2320.1* issued by the CFOSection N, Closeout Phase.

h)9. Return of Grant Funds

The Controller, or designee, must be notified in the event that grant funds need to be returned to the grantor for any reason. The Department Director from the recipient department must also prepare a letter to the granting entity and provide a draft of the letter to the <u>Assistant Controller Grants Development Supervisor</u>, who shall route it to the Chief Financial Officer and the Department's Authorized Signatory as defined in *Section GH*, *Authorized Signature Authority*, for approval before the letter and funding is returned to the granting entity. The letter should express the City's regret in returning the funding and clearly articulate the specific reason(s) funding is being returned.

<u>i)10.</u>Site Visits, <u>Inspections</u> and Audits

In the event that a grantor, auditor or inspector requests a site visit and/or audit, the <u>Grant Managergrant project manager</u> must notify their department's GOC Liaison and the <u>Assistant ControllerGrants</u>

<u>Development Supervisor</u> with the date and time of the site visit. The <u>Assistant ControllerGrants Development Supervisor</u> will determine whether attendance by Office of Business and Financial Services' Grants Unit is necessary on a case by case basis.

5.L. GRANT OVERSIGHT AND MONITORING

The purpose of this policy is to ensure that all grant-funded initiatives are managed according to the terms set forth in applicable laws and regulations, the grant agreement and all other applicable City policies and procedures.

The grant oversight and monitoring process has four components: (1) Grant Orientation and Review; (2) Accounting and Reporting of Grants; (3) Expenditure Monitoring; and (4) Submitting Grant Reports to Grantor. A flow chart depicting the process is included at the end of this policy.

1. Grant Orientation and Review

2.1 GRANT ORIENTATION AND REVIEW

The purpose of this policy is to ensure the Grant Project Manager, Grants Oversight Committee Liaison, and the Department's Fiscal Manager, and Grant Analyst is familiar with the terms of the award, timelines and grantor due dates at the inception of the grant period of performance.

GRANT ORIENTATION AND REVIEW PROCEDURE

The Grant-Project Manager shall review the project plan, timeline, key deliverables, allowable expenses, compliance requirements and due dates outlined in the terms of the grant agreement with the Department's Grants Oversight Committee Liaison, and Fiscal Manager, and Grant Analyst at the inception of the grant period of performance.

2. Accounting and Reporting of Grants

2.2 ACCOUNTING AND REPORTING OF GRANTS

All grants received by the City, either directly, with the City as athe recipient, or indirectly with the City as a sub-recipient, must be reported to the Controller, or designee, in the Office of Business and Financial Services. Notification shall be provided when the grant is awarded, modified, amended, extended, cancelled or terminated. In addition, all City property and equipment with a useful life of at least one year and per-unit acquisition cost which equals or exceeds \$5,000 and acquired or received through grants shall be tagged and included in the Asset Management inventory regardless of the dollar value.

ACCOUNTING AND REPORTING OF GRANTS PROCEDURE

In order to ensure all grants received by the City are reported on the annual *Schedule of Expenditures of Federal Awards and State Financial Assistance* (SEFA), the Controller, or designee, shall be copied on all agenda items involving grants that are presented during the year to City Council for action.

The Controller, or designee, shall prepare the *Schedule of Expenditures of Federal Awards and State Financial Assistance* based on information provided by the City departments receiving grants. Grants and external awards required to be included on the SEFA are listed in the Catalog of Federal Domestic Assistance (CFDA) or the Catalog of State Financial Assistance (CSFA), both of which can be accessed via the internet.

3. Expenditure Monitoring

The following information shall be provided:

- a) The grantor's fiscal year of the funding award
- b) Grantor name
- c) Granting agency or office name (if any)
- d) The grant's federal or state identifying/contract number (if any)
- e) The Catalog of Federal Domestic Assistance (CFDA) number or the Catalog of State Financial Assistance (CSFA) number, if applicable
- f) The total grant or award amount

- g) The grant type
- h) The term of the award (effective date through end date) [TC15]

2.3 EXPENDITURE MONITORING

Requests for advances, reimbursements and revenue draws shall be submitted according to the terms outlined in the grant agreement, and shall be monitored and reconciled quarterly. The Controller or designee shall monitor the department's department grant activities activity to minimize errors and discrepancies.

EXPENDITURE MONITORING PROCEDURE

At a minimum, the Department's Fiscal Manager or equivalent and <u>Grant Manager grant project manager</u> shall reconcile grant revenues and expenditures with the financial accounting system on a quarterly basis to confirm that charges are allowable and are accurately posted to the general ledger.

All costs must be allowable to be charged against a grant. This means that they are allowable, allocable, necessary and reasonable and provide a direct benefit to a grant-funded project. <u>Unallowable charges are generally noted in the grantor's guidance.</u>

4. Submitting Reports to the Grantor

2.4 SUBMITTING REPORTS TO THE GRANTOR

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

SUBMITTING REPORTS TO THE GRANTOR PROCEDURE

- (1)a) All reporting required by the grantor is the sole responsibility of the Grant Managergrant project manager and the department receiving the grant. Grant Managersproject managers must prepare timely and accurate progress, programmatic, financial, or other reports as required by grantor. The numbers in the reports must tie to the general ledger and have sufficient documentation that reconciles with the revenues and expenditures posted in the general ledger.
- a)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 verification before submitting them to the grantor. If the preparer is the department's Fiscal Manager or equivalent, all financialthe reports.

shall be submitted to the Grant Analyst before submitting them to the grantorshall be submitted to the Grant Project Manager before submitting them to the grantor.

- (2)c) The Grant-Project Manager's supervisor shall review any programmatic reports for content and quality and address any issues with the Grant-Grant-Project Manager before they are submitted to the grantor.
- (3)d) Copies of all reports prepared for submission to the grantor shall be <u>keptuploaded to the Grant Management System</u> by the <u>department to ensure</u> compliance. These reports need to be available as required grantor due date.
- (4)e) The Controller, or designee, shall monitor the financial reports for content and quality and address any issues with the recipient department.

6.M. FILE MANAGEMENT, ACCESS AND RETENTION

<u>The The Grants Development Supervisor</u>, Controller, or designee, may review the files, activities, equipment and facilities, as well as interview relevant personnel and contracted entities, of any City of Orlando project that is funded with grants awarded to the City.

1. File Management

3.1FILE MANAGEMENT PROCEDURE

The department that receives the grant is the keeper of the <u>required</u> grant <u>documentation</u>. <u>master file</u>. All department <u>and master</u> files associated with a grant must <u>include</u> <u>maintain a file structure in one location that includes the following five sections with clear separations between different fiscal years, unless otherwise directed by the grantor:</u>

- a) **Submittal** (e.g., application guidelines and a copy of the submitted 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, fully executed grant agreement, grant amendments, modifications, extensions, cancellations and terminations, evidence grantor considers award closed, and anything else related to the award).
- d) **Finance** (e.g., comparison of budget to actual, purchase orders, vendor contracts, invoices, payroll records, journal entry support, evidence of proper procurement, bids, quotes, etc.).

e) **Reports** (e.g., reports to granting entity and evaluation components, expenditure reports, and other reports as requested or needed).

2. File Retention

3.2 FILE RETENTION PROCEDURE

The department that receives the grant must maintain grant records for at least threefive years fromfollowing the date of submissionelosure of the final expenditure City's most recent audit report or, for Federal awards that are renewed quarterly or annually, fromindicated by the date of the submission of management letter issued by the quarterly or annual financial report, respectively, as reported to the Federal awarding agency or pass-through entity in the case of a subrecipient independent auditing firm. [TC16]

- a) If any litigation, claim, negotiation, audit, or other action involving grant records has been started before expiration of the three-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 three-year period, whichever is later.
- all issues which arise from it, or until the end of the regular five-year period, whichever is later.
 - <u>a)b)</u> Grantors may require retention periods in excess of the City's policy of <u>threefive</u> years. Departments must ensure they comply with retention requirements specified by each grantor when they exceed the City's retention policy.
 - b)c) Retention requirements extend to books of original entry, source documents supporting accounting transactions, the general ledger, subsidiary ledgers, personnel and payroll records, invoices and related documents and records that justify expenditures.
 - e)d) 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, work activity reports or equivalent documentation for all individuals reimbursed under the award.
 - d)e) Recipient departments are also obligated to protect records adequately against loss, theft, fire or other damage in accordance with statutory provisions of Chapters 119, Public Records Law and 257, Public Libraries and State Archives, of the Florida Statutes, as outlined in the most current General Records Schedule.
 - e)f) Except for the provisions above, records must be destroyed in accordance with Chapters 119, Public Records Law and 257, Public Libraries and State Archives, of the Florida Statutes. Proof of document destruction is retained by the City Clerk.

CLOSEOUT PHASE

Closeout is the process that officially ends the grant agreement between the grantor and the City department that has received the award. Before a department closes out with a grantor, the department must first perform closeout with the City via the *Grant Closeout Form*, and obtain approval from the Grants Development Supervisor to closeout with the grantor. A flow chart depicting the process is included at the end of this policy.

CLOSEOUT PROCEDURE

- :1 Complete Project or Program Activity. A grant is considered complete when the project or program funded by the award is complete, or the award period of performance ends. The Grant Project Manager has the prime responsibility of ensuring that a continuation, supplement, or no-cost time extension is requested in a timely manner to continue the project, which is typically at least 45 days prior to the end of the award end date. If the City has not secured a continuation, supplement, or no-cost time extension by the end of the award period of performance, grant closeout must occur.
- *2 Prepare for Grant Close-out Before Closing Out With the City and the Grantor.

 The recipient department must prepare and submit all financial, performance, and other reports required under the grant (except for the final or closeout reports until after approved by the Grants Development Supervisor); settle cost share/matching commitments (including reimbursement to the City of any remaining allowable costs and refunds to the grantor of unobligated cash); prepare final expenditure report and review expenditures for accuracy and allowability; submit final invoice(s) and final cash draw(s); and determine proper disposition of grant purchased property within the timeframe specified by the grantor.
- :3 Complete the City's *Grant Closeout Form*. Upon completion of the project or program, or the end of the period of performance, the Grant Project Manager and the department's Fiscal Manager must complete and sign the *Grant Closeout Form* and send it to the Grants Development Supervisor at least 30 days before it is due to the grantor.
 - A. The Controller or designee shall review revenues and expenditures identified in the *Grant Closeout Form* against what is recorded in the financial accounting system and schedule a grant closeout meeting with the Grant Project Manager, department's Fiscal Manager and Grants Oversight Committee Liaison, to review findings and/or discrepancies, and initiate any budget adjustments.
 - B. Upon review of the *Grant Closeout Form* and satisfaction of any discrepancies, the grant closeout form shall be approved by the Grants Development Supervisor before initiating the closeout process with the grantor.
 - C. Upon approved closeout, the department's Budget Analyst shall place the fundand/or project in a no posting status.

- D. The approved *Grant Closeout Form* and final expenditure report shall be placed in the grant master file.
- :4 Provide Asset Management with instructions for property disposition.
- :5 Initiate Closeout with the Grantor. The Grant Project Manager initiates closeout with the grantor by providing final and/or closeout reports and other required documentation.
- :6 Obtain Written Confirmation of Closeout from the Grantor. The Department shall obtain written confirmation from the grantor official or head of agency that all required closeout actions have been completed and place it in the grant master file. [TC17]
 - :5 FORMS:

Grants & Financial Assistance Approval Form, Grant Closeout Form. [TC18]

:6—COMMITTEE RESPONSIBILITIES:

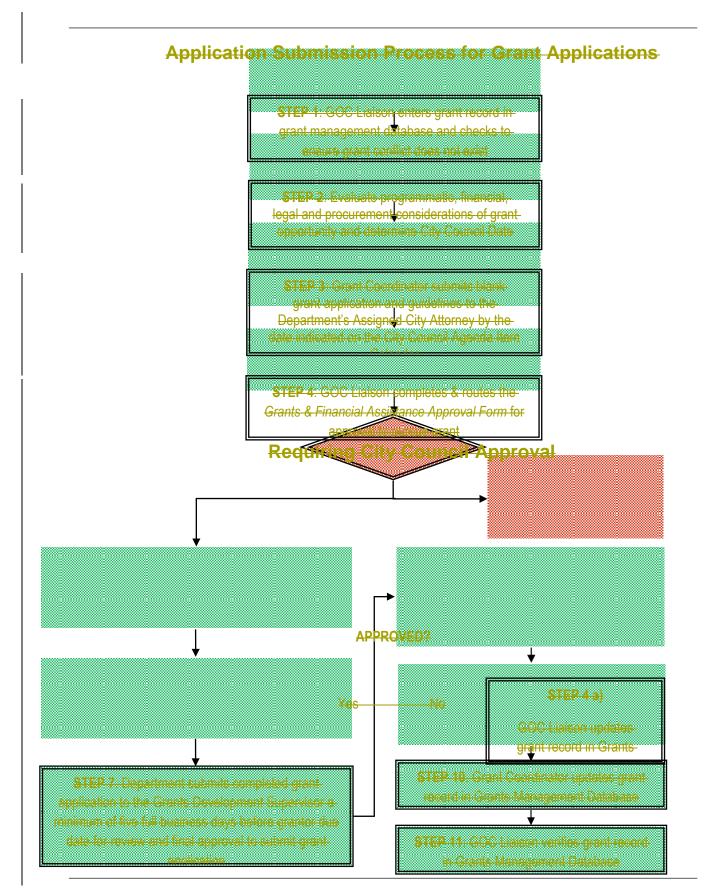
The Grants Oversight Committee, under the direction of the <u>Assistant Controller Grants</u> <u>Development Supervisor</u>, is responsible for reviewing <u>and updating</u> these policies on an annual basis and updating when necessary.

:6:7 REFERENCE:

Procedure Policy adopted by City Council October 15, 2007, Item A11, and modified on May 9, 2011, Item 7-1; amended September 6, 2017.

:7:8 EFFECTIVE DATE:

This procedure policy is effective, October 1, 2017. May 9, 2011.

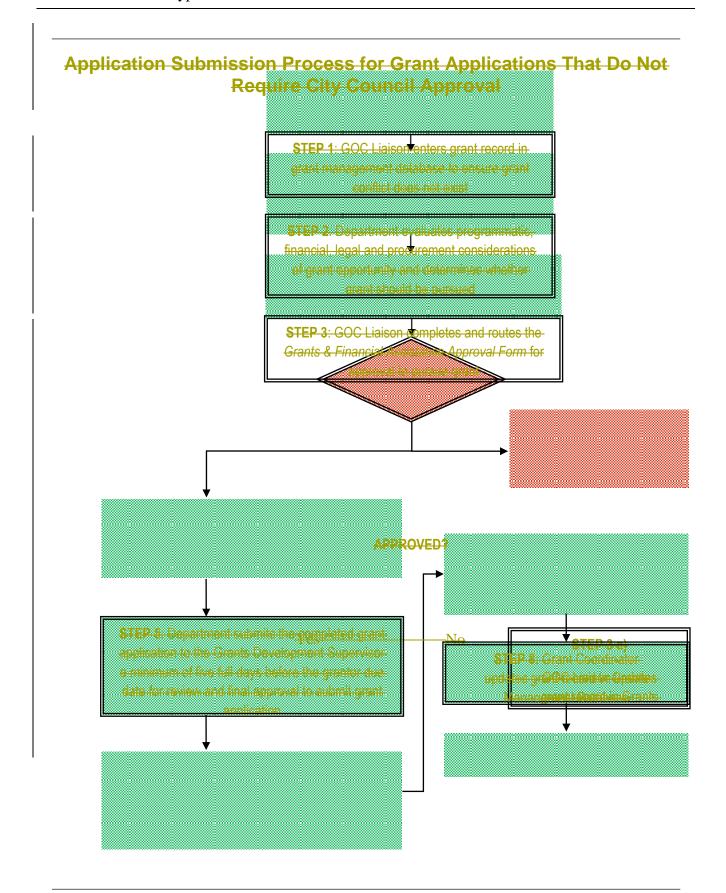


STEP 5: Department begins writing grant
application OR requests the Grants Development
Supervisor enter a purchase requisition to beginworking with contracted grant writer

STEP 8: Department requests that the City Clerk obtain Mayor's signature on final grantapplications OR obtain proper signaturedelegation from Mayor if the grant application requires electronic signature

STEP 6: Department creates a Council Agenda Item in the Paperless Agenda System to obtain City Council Approval within the timeframe necessary tomeet the grantor's application deadline

STEP 9: Department verifies that proper signatures have been obtained and submits the grant application to the grantor by the grant application due date

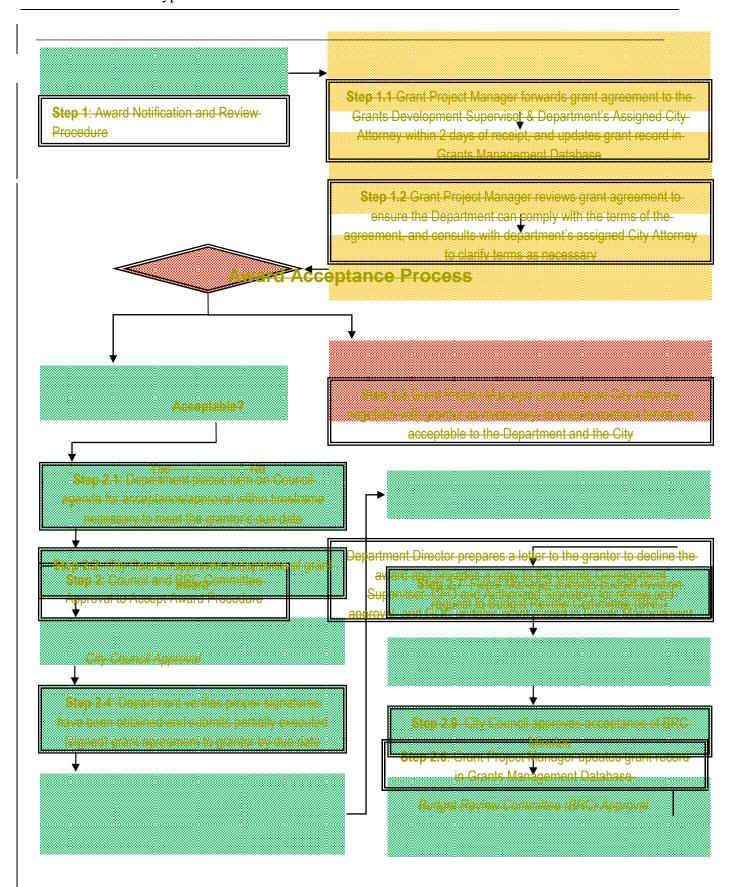


STEP 4: Department begins writing grant application OR requests the Grants Development Supervisor enter a purchase requisition to begin working with contracted grant writer.

STEP 7: Department verifies that proper signatures have been obtained and submits the grant application to the grantor by the grant application due date

STEP 6: Department obtains Department's
Authorized Signatory's signature as indicated in
Section H, OR obtain signature delegation from
the Department's Authorized Signatory if the grant
application requires electronic signature

STEP 9: GOC Liaison verifies grant-record in Grants Management Database



Step 2.3: City Clerk obtains Mayor signature ongrant agreements

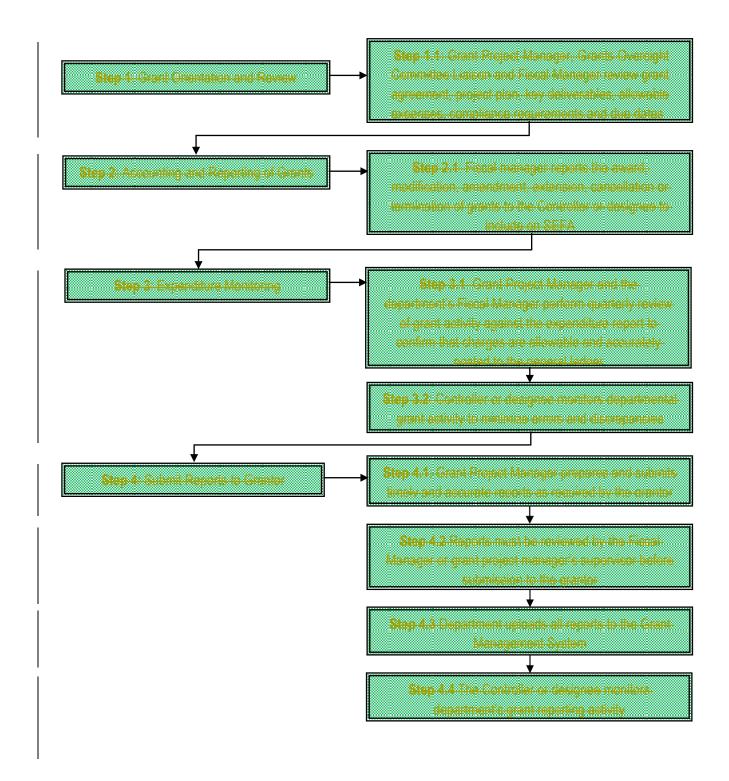
Step 2.8: Budget Review Committee (BRC) approves

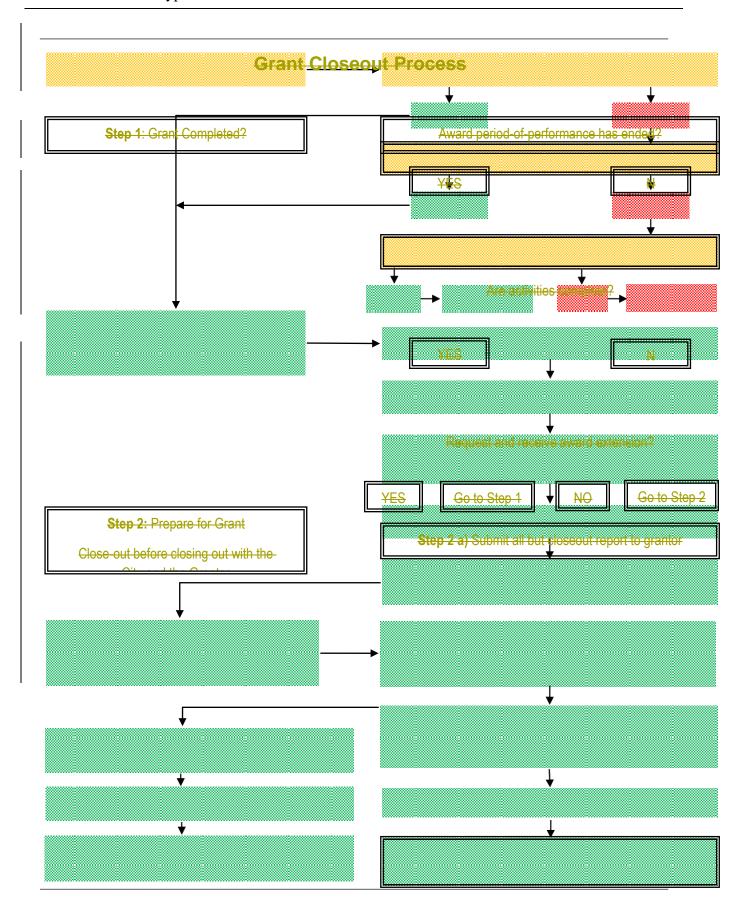
Budget Revision request

Step 2.5: Department receives fully executed (signed) grant agreements from grantor and submits one original grant agreement to the City-Clerk and files the second original in the grant

Step 2.10: Department can begin incurring costs and/or expending grant funds once City Council has approved BRC minutes and department has received the fully executed grant agreement back from the

Grant Oversight and Monitoring Process





Step 2 b) Settle all cost share/ matching commitments

Step 2 c) Prepare final expenditure report and reviewexpenditures for accuracy and allowability

Step 2 d) Submit final invoice or perform final cash draw

Step 2 e) Perform inventory and determine properdisposition of property and equipment

Step 3 a) Controller or designee shall review revenues and expenditures against financial accounting system and schedule a closeout meeting if necessary

Step 3 b) Grants Development Supervisor signs Citygrant closeout form once closeout items and requirements are complete and satisfactory

Step 3 c) Budget places the project in no posting status

Step 3 c) Department places the grant closeout form and final expenditure report in the grant master file

Step 3: Complete City's Grant Closeout
Form and submit to the Grants Development
Supervisor to request closeout with the City

Step 4: Department provides Asset Management withinstructions for property disposition

Step 5: Department initiates closeout with the grantor

Step 6: Department obtains written confirmation of closeout from grantor

Grants & Financial Assistance Approval Form



Grants & Financial Assistance Approval Form

Transmittal	Authorized		Signature	Date
Sequence	Approver		Signature	Date
1	Department Director	Approved		
	Insert Name	By:		
1A	Department Director 2	Approved		
	Insert Name	By:		
2	Department Budget	Verified		
	Analyst	By:		
3	Department's Assigned	Approved		
	City Attorney	By:		
4	Department's	Approved		
	Authorized Signatory ¹	By:		
5	Grants Development	Approved		
	Supervisor	By:		
6	Chief Financial Officer	Approved		
		By:		
7	Return to Department	Received		
	GOC Liaison	By:		

Following are the financial, programmatic, legal and procurement considerations for your review:

Today's Date:	City Council Date	<u>:</u>	Application Deadline:
Name of Grant:			
Short description of the project	or program that w	ill be pursued with	grant funding:
Short description of the probl	em or need for the	project or prograi	n:
Anticipated timeline of project	or program		
Name of Initiating Department	/Division/Office:		
GOC Liaison Name:	Telepho	ne #:	
Programmatic Considerations	;	Indicat	e Response Here
 How does the proposed proj 	ect align		
with City's priorities and			
department's core services?			
Does the proposed project p			
expand essential services to	address		
critical needs?			
Does the proposed project in	npact		
other City departments?			
 Does the applying departme 	nt have		
the capacity to manage this	project?		
Does the applying departme	nt have	•	_
the capacity to fulfill the fin	ancial		
and administrative requirem	ents of		
the grant?			

Authorized signatories are as follows: CAO for Operating Departments, Chief of Staff for Executive Offices, OBFS for OBFS and City Attorney for the City Attorney's Office.

Grants & Financial Assistance Approval Form

(page 2)

Grants & Financial Assistance Approval Form

Grants & Financial Assistance Approval Form

	nancial Considerations	Indicate Response Here
	What is the total auticipated project cost?	
2.	How much does the Department anticipate	
	receiving from the grantor? If not	
	receiving cash, include the value of	
	property, equipment, or services.	
3.	What are the match requirements and	
	funding source(s)?	
4.	If applicable, identify the amount and	
	funding source(s) that support the	
	remainder of the project or program cost.	
5.	Will the grant be used to fund salaries,	
	wages or benefits and other associated	
	personnel costs?	
6.	Will the receipt of this grant cause the	
	City to incur additional or future operating	
	costs?	
7.	What is the CIP number and/or financial	
	project number associated with this	
	project?	
8	Will this program generate revenue?	
	Is supplanting allowed?	
	Does the grantor require any special ways	
10.	to manage the receipt of grant funds?	
11	Does the grant require continuation of the	
	project or program beyond the grant	
	period of performance?	
T a	gal Considerations	Indicate Response Here
	Provide a short description of unique	indicate Response nere
1.		
	contract requirements that the City	
	Attorney needs to be made aware of, or	
	needs to clarify for the Department before	
_	the Department applies for the grant.	T. 1: TT
	ocurement Considerations	Indicate Response Here
1.	Provide a short description of any special	
	procurement requirements that need to be	
	disclosed and evaluated at the time of	
_	application.	
2.	Does the receipt of the grant involve the	
	lease or purchase of real estate? If so,	
	please describe the real estate need and	
	add the Real Estate Division Manager as	
	an impacted department director, by	
	adding a row under the first department	
	director in the transmittal sequence on	
	page one of this form.	

Grant Classout Form

Grant Classout Form



GRANT CLOSEOUT FORM

FORM INSTRUCTIONS

- Section 1 is to be completed by submitting Department prior to initiating closing with grantor. Form is then to be submitted
 with Master Grant File to Grants Development Supervisor.
- (2) Section 2 is to be completed by Controller or designee. Checkmarks indicate agreement. Approved form will be submitted to Budget Analyst and the submitting Department can initiate closeout with grantor.
- (3) Section 3 is to be completed by Budget Analyst. Checkmarks indicate completion. Form is then to be returned to Controller or designee.
- (4) Controller or designee will hold form until submitting Department provides a copy of the correspondence from grantor concurring all legal obligations of the award have been fulfilled and indicating the amount disbursed by grantor is equal to the City's records of the amount received. Completed form will then be filled in Master Grant File.

completed by Submitting Departmen	nt.	
-	Award Amount:	\$+
-	Eligible Expenditures incurred to date*:	\$+
-	Cash received to date*:	\$+
-	Cash to be received/(returned):	\$+
-	Required match:	\$+
-		
-		
	*Date:	
- ,Grant Project	Manager	
- "Fiscal Manager or E	*Date:	
September 3, 2008. Updated December 8, 2008, October	r 22, 2009, April 7, 2011.	
	- ,Grant Project	Award Amount: Eligible Expenditures incurred to date*: Cash received to date*: Required match: Required match: - - - Grant Project Manager

(p a g e 2)

Financial Information a	bove agrees to City's financial accounting system	em.		Г
2. No unusual budget var	ances or outstanding encumbrances noted.			Г
3. Appears Master File is	omplete, in accordance with City P&P.			Г
4. Appears all applicable :	tate and federal compliance requirements we	re followed and do	ocumented.	Г
-				
Completed by: -		Date:	-	
Completed by: - Print name	- ,Controller or de:		-	
	- ,Controller or de: , Grants Development Supe	signee Date:	-	
Approved by: Print name	, Grants Development Supe	Date:	-	
Approved by: Print name Section 3, Budget		Date: ervisor y Budget A nal	-	
Approved by: Print name Section 3, Budget 1. Prepared Budget Adjus	, Grants Development Supe	Date: ervisor y Budget Analy , as necessary.	-	