

*Council Revised on 4/13/2021*

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## **CITY OF BARRE**

### **GRANTS MANAGEMENT POLICY**

#### **PURPOSE**

Barre City recognizes that grant funding provides significant resources to enhance the City's ability to provide services and activities not otherwise available. City staff within the authority of the City Council, may seek grant funding for activities that are determined to further core City functions or that provide for activities which are in the best interests of our residents. The purpose of this policy is to ensure that acceptance of each award granted to the City is formally authorized by the City Council. Further, this policy is intended to provide procedures relating to the requirements for grant applications and awards, and to ensure that City Departments are accountable for proper grant documentation, administration, and activities.

#### **AUTHORITIES**

Grant applications may be completed by City staff, City Committees, third parties designated by the Manager, and/or City Councilors, and are hereinafter referred to as the Applicant. All non-staff Applicants are responsible for coordinating with the City Manager or their designee to ensure compliance with the provisions of this Policy and/or any Grant Award/Grant Agreement for which the Applicant was the sponsor. The application may be submitted after approval from the City Manager and/or the City Council, in accordance with this policy.

All grant contracts will be approved in accordance with the City's Procurement Policy and procedures and all grant applications will be signed by the City Manager as the MAO (Municipal Authorizing Official) or the Manager's designee (as documented in writing).

#### **PRE-APPLICATION REVIEW FORM**

The City of Barre assumes a legal and financial obligation to a grantor, contractor, or partner when it accepts grant funding. Any Applicant considering applying for a grant must coordinate with the City Manager before preparing a grant application or proposal.

Once a grant opportunity is identified by an Applicant, a Grant Application Review Form (GARF-Attachment A) must be completed and sent to the City Manager, before the grant may be considered by the City Council. This form must indicate:

#### **Financial Elements**

1. Funding Agency and Program
2. Level of grant funding sought
3. Purpose and Scope of project
4. Amount of match or in-kind requirements
5. Is there requirement for the City to make a commitment to permanently employ project staff at the end of the grant? If so, explain.
6. Does this grant involve significant partnerships with other organizations (requiring Memorandums of Understanding or Intergovernmental Agreements)?
7. How does this proposed grant align with the City's strategic priorities and/or Department's Operating Plans?
8. How does this grant provide for or expand services to address critical need?

#### **Program Requirements**

Does the proposed grant:

1. Align with City's strategic priorities and/or department's operations plans?
2. Provide or expand services to address critical need?
3. Fall within the City's capacity to administer the financial and administrative aspects of the grant?

The City Manager and City Council must approve the project's budget, in-kind match and any commitments about sustaining the project after the grant ends.

## **RESPONSIBILITY FOR MAINTENANCE OF FILE AND PUBLIC DISCLOSURE**

Upon initiation of the grant application process, an electronic folder shall be established in the City's network, as designated by the originating City staff and as coordinated with the Grants Administrator and/or the Finance Director. The original grant contract and any approved amendments shall be retained by the appropriate Department Director (or designee) with digital copies to the network folder for accessibility by the Finance Director and/or the Grants Administrator for administrative support and auditing purposes. (Note: Because the Police Department has a separate secured server, centralized electronic storage logistics shall be coordinated on a case-by case basis between the Police Department and Grants Administrator). The official grant file, including a copy of the signed contract and all documents associated with the grant, including but not limited to the contract and amendments, applications, pre-application questionnaire, activity reports, requests for reimbursement, fiscal reports, and other correspondence will be maintained by the initiating City staff. Original grant applications and related documents prepared by a non-staff member shall be forwarded to the Grants Administrator. The non-staff party may retain copies (Xerox or electronic) for committee files. Any destruction of these records will be in accordance with grantor/federal requirements and/or the approved retention schedule in the appropriate department. Public records requests regarding grants will be referred to the initiating City staff for coordination of public records gathering and release.

## **GRANT ROLES AND RESPONSIBILITIES**

The Applicant, with the assistance/support of the Finance Director and/or Grants Administrator, is responsible for the oversight of grant related financial activity. Non-staff grant Applicants (i.e. Committee Chairs, Councilors, etc.) are responsible to coordinate grant and financial administration with the Grants Administrator and Finance Director. The Finance Director and/or Grants Administrator 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 finance for grants and other responsibilities indicated throughout this policy. The Finance Department is responsible for creating a grant fund and/or project number, which is used to recognize grant revenue and expenditures in the department's budget.

Applicants that apply for and utilize grant funds are responsible for coordinating all aspects of the grant process with the Grants Administrator. These include planning for grant acquisition, preparation and submission of grant proposals to the City Manager, preparing City Council Agenda items apply for and/or to accept grant awards, preparing budget revision requests, developing grant implementation plans, managing awarded grants and projects, preparing and submitting reports to grantors, and properly closing out grant projects as detailed in this policy and the grant agreement. The following roles further define grant related responsibilities of the Applicant:

- Communicate grant related information to all relevant staff with awarded grant responsibilities;
- Serve as the conduit for grant related ideas and information;
- Obtain necessary approvals and signatures as indicated in this policy; and
- Ensure City grant policy and procedures are being followed.

Subject to the authorization of the City Council, the City Manager has authority to approve and sign grant applications at the time of application submission. In addition, the City Manager shall be the final arbiter of which department will submit the application with regards to approving submission of multiple applications to a grantor.

## **CONFLICT OF INTEREST**

Real or perceived conflicts of interest shall be avoided in the preparation of any grant application. When in doubt, the City's Conflict of Interest Policy shall be referenced in the preparation of any grant application for the City. Potential conflicts of interest shall be disclosed to the City Manager and/or City Council for assessment prior to the preparation of any grant application.

## **LETTER OF SUPPORT REQUESTS FROM EXTERNAL ORGANIZATIONS**

External organizations frequently seek support from the City for grant applications they intend to submit to grantors. Requests for such support are often made to City staff that may be unaware of whether other City departments are competing for the same grant opportunity. Additionally, there may be other reasons why it would not be in the City's interests to provide a letter of support. Requests for such letters of support should be forwarded to the City Manager for response. Letters of Support may be executed by the City Manager, unless the City Manager determines that

circumstances warrant authorization by the Council and/or signature by the Mayor. This shall not pertain to project partners who are submitting non-conflicting grant application.

### **COUNCIL APPROVAL TO ACCEPT AWARD**

The Applicant requesting acceptance of a Grant Award and underlying grant agreement must prepare a Council agenda item and submit it to the City Manager for the Council's authorization to accept the Grant before executing and returning and Award documents if (1) acceptance by the legislative body is required by the grantor, or (2) the grant terms and amounts have materially changed since application was approved by the City Council. The agenda item must be accompanied by the award letter, grant agreement and any other required documentation, to the extent such documents are made available by the grantor prior to the requirement that the award be accepted.

Once the City Council has approved the grant award, and unless otherwise directed by the City Council, the City Manager, or their designee, shall be authorized to sign the grant. Once duly executed, the City Manager or their designee is responsible for submitting the grant award acceptance to the grantor.

The City Manager or their designee must provide a digital copy of the fully executed grant agreement to the Finance Director and Grants Administrator when the fully executed grant award is returned to the City by the grantor.

### **APPLICATION SUBMISSION**

Each grant application submitted for consideration to the City Manager or City Council on behalf of the City should be aligned with an established City priority, or otherwise advance the City's interests, and have matching funds available if required by the grantor. In addition, applications must demonstrate consideration to the means for continuation of the project or program when the grant period ends

The City Manager is responsible for ensuring that pre-application assessment factors noted above have been evaluated and completed prior to submissions.

### **EXCEPTIONS**

The following types of grant applications shall be exempt from the requirements of this policy and may be approved administratively by the City Manager:

- Reimbursements from other governments that take the form of grants (i.e. FEMA Public Assistance);
- Administrative grants (i.e. PACIF grants);
- Grants with no match requirements that fund existing operational functions or asset replacements/upgrades;
- Pass-through grants; and
- Grants under \$25,000.

The City Manager shall notify the City Council of any grant applications made or accepted by the City under this section.

### **USE AND RECEIPT OF GRANT FUNDS**

Grant funds must be properly used and received by the City of Barre. Violations can result in a range of penalties, including suspension of future fund from the grantor, return of all funds associated with the award, including those already expended, and civil and/or criminal penalties.

Fixed assets purchased with federal or state funds, with an acquisition cost of \$5,000 or greater, must be inventoried, tagged (where practical) and tracked as such in NEMRC fixed asset module. Asset ownership, transfers and disposal of assets need to be properly documented and follow the guidelines within the grant agreement. Federal equipment should be inventoried at least every two (2) years in order to safeguard against theft, damage, or loss.

### **GRANT REPORTING**

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

Copies of all financial status, programmatic report and final reports prepared for submission to the grantor shall be provided to the City Manager (or Manager's designee), Finance Director, and Grants Administrator for content and quality review. Upon acceptance, a copy of the report will be placed in the network folder for audit purposes.

## **GRANT RECORDS RETENTION**

Unless otherwise specified in any grant agreement, the City of Barre maintains records for three years following the closure of its most recent audit report. If any litigation, claim, negotiation, audit, or other action involving grant records has been started before the expiration of the retention period, the records must be retained until completion of the action and resolution of all issues which rise from it, or until the end of the applicable retention period, whichever is later.

Typical documentation preserved in grant files shall include, as appropriate:

- Statistical and other information used in preparation of and support of the grant
- Award (award letter, council agenda item, grant agreement, grant amendments, modifications, extensions, cancellations and termination and anything else related to the award)
- Statistical and other information used in preparation of and support of the grant
- Finance (account set up, purchase orders, invoices)
- Reports (reports to granting entity and evaluation components)