Index No:
 2090

 Date:
 3/25/95

 Revised:
 6/23/09

 Revised:
 12/1/13

# **GRANTS PROCUREMENT, DEVELOPMENT, COMPLIANCE & ACCOUNTABILITY**

### I. <u>PURPOSE</u>:

The following guideline establishes policies and procedures for the procurement development, accountability and compliance of Federal, State and foundation grant awards and other non-traditional revenues for the City of Little Rock.

#### II. <u>DEFINITIONS/APPLICABILITY</u>:

- A. This guideline shall apply to all City Departments applying for and/or receiving grants, foundation awards and other non-traditional revenues. Outside agencies or entities utilizing City resources may be held to the same level of accountability as City Departments.
- B. This guideline does not apply to discounts, scholarships or other awards available to City Staff to participate in any type of training program. It also does not apply to funds available through civil forfeiture procedures created by State or Federal Law unless there is a Catalogue of Federal Domestic Assistance (CDFA) number assigned to the program.

<u>Background</u>: In order to provide greater accountability, the Finance Department established a Grants Management Division (hereinafter Grants Division) in 2004 primarily for the management and compliance purposes. In 2008, the duties were expanded to include coaching the City Departments and other outside agencies and related organizations, as requested, in the areas of grant development and writing.

#### III. <u>PROCEDURES</u>:

- A. The priorities will be to seek and acquire: 1) funding sources that assist the City to complete the *Goals for Little Rock* recommendations; 2) funding sources that assist City Departments to further enhance their respective services and/or programs; 3) funding sources that assist City Boards and Commissions to further enhance their respective mission/purpose; and 4) funding sources that assist neighborhood groups and/or community organizations achieve their needs.
- B. The City Departments are primarily responsible for identifying possible grant funding sources for their Departments. In addition, Grants Staff will seek funding. Once a funding source is identified, the Department or

Grants Staff will forward information to each other. The City Department and/or community organization will notify the Grants Division of its desire to pursue these funds. If a Department desires to apply for the grant, then a brief synopsis shall be tendered by the Department to the City Manager for his approval to proceed to application. The City Department and/or community organization is expected to complete the application with coaching from the Grants Division. On occasion, the Grants Division will complete the application. Upon request, the Grants Division may load applications into the grantors system.

- C. Grant applications for competitive grants should not be submitted to the granting agency without the review and approval of the Grants Division. Sufficient time must be allowed for a meaningful opportunity to review and make amendments, if necessary.
- D. Prior to final completion of a grant application, the "Grant Application Approval Request Form" must be completed and forwarded to the Grants Manager. The Grants Manager will verify the information including the availability of matching funds and will forward it to the Finance Department Director for review. Following the Finance Director's review, a recommendation will be made to the City Manager as to whether the application should be filed. In reviewing requests, the reviewers will take the following factors into consideration: 1) the overall priority of the request; 2) the possibility of successful acquisition of funding; 3) the City's required monetary contribution/match; 4) the amount of non-monetary resources required from the City for the grant 5) the long-term impact of the grant; and 6) the overall scope/impact of the grant on the community.
- E. The City Manager's approval is required for grant applications.

## IV. ACCOUNTABILITY:

- A. When the City of Little Rock receives grants, revenues and expenditures will be accounted for by the City's Finance Department. Compliance with grant regulations will be the responsibility of the receiving Department, with financial oversight by the Finance Department's Grants Management Division. In addition, the Grants Division may directly receive grant money to manage for the City.
  - 1. Department Directors:
    - a) Review grant applications for completeness, accuracy and relevance to the Department's guidelines, goals and objectives. Review relevant laws and regulations to ensure that the Department has the capacity to complete the grants project within the time frame provided.
    - b) Forward signed Grant Application Approval Request Form to the Grants Manager in a timely manner.
    - c) Monitor grant activity and expenditures to ensure compliance with terms of grant, including required audits.

- d) Notify the Grants Manager immediately of any <u>allegation</u> of fraud or misuse of grant funding.
- 2. Departmental Grant Officer:
  - a) Attends mandatory Grants Management Class conducted by the Grants Division.
  - b) Notifies the Grants Manager immediately of any allegation of fraud or misuse of grant funding.
  - c) Maintain any posting required by the grant or ARRA.
- 3. Finance Department:
  - a) Reviews grant agreements prior to the City Manager's approval (signature).
  - b) Maintains a master file of all grants applied for and awarded to the City. Prepares monthly and annual financial reports of all grants awarded, revenues received and associated expenditures. Reviews and approves of all purchase order's, subrecipient awards and bid specifications involving grants.
  - c) Coordinates any grant compliance audits and program audits by grantor agencies with the applicable Department Director.
  - d) The Grants Manager shall conduct investigations into any allegation that grant funds are not being spent properly, including working with any Inspectors General.
  - e) The Grants Division shall review and approve of any ARRA reports that are to be filed with either the granting agency or on-line.

Approved:

and T

Bruce T. Moore City Manager