


# MONROE COUNTY SHERIFF'S OFFICE

## General Order

<b>CHAPTER:</b> 080-A		<b>TITLE:</b> Grant Procedures
<b>EFFECTIVE DATE:</b> August 19, 2009	<b>NO. PAGES:</b> 5	<b>REVIEWED/REVISED:</b> August 8, 2019
<b>REFERENCE:</b>		<b>RESCINDS:</b>
 <b>Sheriff of Monroe County</b>		

**I. PURPOSE:** The purpose of this directive is to establish procedures when submitting grant applications, in accounting for the use of federal and state funds and in maintaining pre-audit and post-audit review in accordance with the following governing laws and regulations:

**A. Federal**

1. Federal Grant and Cooperative Agreement Act of 1977, as incorporated in Title 31 Section 6304 of the U.S. Code.
2. 2 CFR Part 200-Uniform Administrative Requirements, Cost Principles and Audit Requirements for Federal Awards (Uniform Guidance).
3. Single Audit Act of 1984 as amended in 1996.

**B. State**

1. Florida Statute 125.01
2. Florida Administrative Code
3. Rules of the Auditor General, Chapter 10.550, Local Governmental Entity Audits.
4. Florida Single Audit Act, Florida Statute 215.97.
5. Standards of conduct for public officers, employees of agencies and local government attorneys, Florida Statute 112.313.
6. Voting conflicts, Florida Statute 112.3143.

**II. POLICY:** This policy shall apply to all MCSO personnel.

**III. DISCUSSION:**

- A. Good management practices recognize that a carefully designed grant process can help MCSO obtain funding for equipment, programs or essential personnel to fulfill the agency's goals and objectives that otherwise may not be available.
- B. Many excellent ideas for funding are often conceptualized at the line level. The Sheriff encourages all members to participate in the grant process.

- C. Any employee of MCSO may initiate a request for a grant consideration or develop a concept document on behalf of MCSO.

#### **IV. PROCEDURE:**

- A. An employee desiring to pursue grant-funding sources should submit all of their information and supporting documentation including the deadline for the funding source via their chain-of-command to the grant administrator. It is crucial to understand the grantor's requirements and all applicable laws which govern the grant program. Employees are not authorized to directly submit grants on behalf of MCSO unless directed by the Sheriff or his designee.
- B. The grant administrator will participate in development meetings and will meet with the appropriate command staff to draft and review proposed grant applications. The grant administrator will ensure that the proposal meets the concept and needs of MCSO. The grant administrator should thoroughly review the grant guidelines including:
  - 1. Eligibility
  - 2. Submission deadlines
  - 3. Funding and programmatic goals and priorities
  - 4. Proposal format, evaluation process, criteria and timetables
  - 5. Budgets and budget justification narratives
  - 6. Point(s) of contact
  - 7. Allowable supplemental material and any other submission requirements
- C. The proposal will identify the person who will serve as the project manager/grant administrator. This person shall be responsible for the overall administration, implementation, management and compliance of the grant award. Grant funds awarded to MCSO may not be used to replace or supplant non-federal funds that have been appropriated for the same purpose. All procurement associated with grant-funded projects will follow the grant and MCSO policy and procedures. All property acquired with grant funds will also follow the grant and MCSO policy and procedures for property and inventory control.
- D. As required by 2 CFR 200.112 Conflict of Interest, MCSO must abide by the following:
  - 1. The Florida Code of Ethics for Public Officers and Employees, Florida Statute 112 Part III
  - 2. General Orders Chapters 13, 30 and 80

Should there be any potential conflict of interest at any time, MCSO will disclose in writing such information to the federal awarding agency or pass-through entity.
- E. All grant applications must have the approval and signature of the Sheriff and/or his designee prior to submission of the proposal. The project manager/grant administrator shall submit the grant application in accordance with the grantor's requirements and in the format specified. It is important to maintain a grant timeline and copies of all grant documents and related items should the grant be awarded.

The grant administrator will work with the MCSO Legal Office, Finance Division, the County Attorney's Office and Board of County Commissioners to ensure that all agenda items and agreements are presented to the appropriate parties when deemed necessary.

- F. Once a grant has been awarded, the grant administrator will ensure that all of the documentation is disseminated among the appropriate parties (i.e., Legal, Finance, County Commission, etc.). With the implementation of the Uniform Guidance, the Finance Division will be responsible for maintaining internal procedures to ensure all requirements of the grant are met including the following:
1. 2 CFR 200.113 Mandatory Disclosures: The Human Resources Division is the responsible investigating entity should there be any alleged incident of conflict of interest. Refer to MCSO General Orders Chapter 080 Ethics and Code of Conduct section.
  2. Internal Affairs has been designated as the division responsible for monitoring federal criminal violations. Should there be a violation, the federal awarding agency will be promptly notified by Internal Affairs. Chapter 020 of MCSO General Orders will be followed, should there be a violation of federal criminal law by an employee.
  3. 2 CFR 200.318 through 2 CFR 200.326 identifies the Procurement Standards to be followed under a Federal award. MCSO General Orders Chapter 080 clearly identifies the policies which are strictly followed. MCSO has elected to utilize the extended grace period of December 25, 2017 for compliance with the procurement standards under OMB Uniform Guidance and will continue to update policies and procedures to reflect Federal requirements and provide additional clarification as needed. In order to comply with the Uniform Guidance, MCSO acknowledges the prohibition from providing geographical preference in the evaluation of bids and proposals. Currently, the Legal Department reviews all agreements to ensure required contract provisions are included when applicable as reflected by the following items:
    - a. Breach of Contract
    - b. Termination for Cause and Convenience
    - c. Equal Employment Opportunity
    - d. Davis-Bacon Act
    - e. Contract Work Hours and Safety Standards Act
    - f. Rights to Inventions Made Under Contract or Agreement
    - g. Clean Air Act and Federal Water Pollution Control Act
    - h. Debarment and Suspension
    - i. Byrd Anti-Lobbying Amendment
    - j. Procurement of Recovered Materials
  4. A person or entity debarred or suspended is excluded from receiving federal assistance and benefits. It is the responsibility of the project manager/grant administrator to ensure the MCSO and its sub-recipients do not award grant assistance to entities who are debarred or suspended or otherwise ineligible for federal assistance programs. A documented check of the following lists are required.

- a. The federal Excluded Parties List System (EPLS) is now accessible through the System for Award Management (SAM). The EPLS can be searched at the following website: <https://www.sam.gov/SAM/>
  - b. The state Convicted/Suspended/Discriminatory/Complaints Vendor Lists is accessed at: [http://www.dms.myflorida.com/business\\_operations/state\\_purchasing/vendor\\_information/convicted\\_suspended\\_discriminatory\\_complaints\\_vendor\\_lists](http://www.dms.myflorida.com/business_operations/state_purchasing/vendor_information/convicted_suspended_discriminatory_complaints_vendor_lists).
  - c. There is also a List of Excluded Individuals and Entities (LEIE) maintained by the U.S. Department of Health and Human Services Office of Inspector General. Individuals and entities excluded from providing services for federally funded health care programs are maintained on this list. The LEIE can be accessed at: <https://exclusions.oig.hhs.gov/>.
  - d. While not required, it is recommended that the Project Manager/Grant Administrator also check the Federal Awardee Performance and Integrity Information System (FAPIS) database prior to issuing a sub-award or subcontract. The FAPIS website is: <https://fapis.gov>.
- G. Each granting agency has its own rules governing applications and awards. The grant award document will outline general conditions associated with the funding. Most grants are on a reimbursement basis and require proof of payment with supporting documentation that goods, services or deliverables were provided. Each grant will identify the reporting and reimbursement requirements including frequency and required forms. In some cases grantors will allow for advanced funds. All advance receipt of funds include additional requirements such as calculation and potential remittance of interest earned, The project manager/grant administrator shall ensure all requirements can be met before requesting advance funding.
- H. The designated project manager/grant administrator will ensure funds are only used for eligible grant activities within the award period and will coordinate with the grants administrator and Finance for the timely drawdown of funds and reporting. Compliance with all terms of the contract is the responsibility of the person named as project manager/grant administrator. Electronic funds transfer from the grantor is preferable when available. When not available, checks must be sent to the Finance Division. Copies of reimbursement requests or advance payment requests must be sent to the Finance Division at the time of submittal.
- I. Project implementation shall be the responsibility of the project manager/grant administrator, including monitoring activities of sub recipients and/or subcontractors to ensure deliverables, goods and/or services are provided. The grant file shall be established and maintained in a clear and well-organized manner, with records and supporting data, in detail sufficient for pre-audit and post-audit review. Supporting data and correspondence related to the grant program, must be maintained by the project manager/grant administrator. Documentation of procurement compliance, should there be goods or services acquired, copies of purchase orders, quotes, invoices and supporting documentation must also be retained in the grant file. A financial accounting, including budget to actuals, must be maintained and reconciled to the financial software general ledger quarterly or more frequently if required by the grant. A record-keeping and grant monitoring system shall be established and maintained by the project manager/grant administrator to ensure reporting and reimbursements are completed and filed in a timely manner, as per the grant requirements.
- J. The grant closeout is the process by which all required administrative and financial actions are satisfactorily completed as set for in the grant agreement. The closeout usually begins 60 to 90 days prior to the end date of the grant to accurately project expenses and allow time to request a grant adjustment should one be needed. The closeout addresses the completion of work or delivery of services and administrative and financial requirements. Should any due dates be unattainable, the project manager/grant administrator should communicate immediately with the grantor to request an extension. The project manager/grant administrator will proceed with securing the required approvals to secure a grant modification for the extension if allowable. The grant

extension document will need to be provided to the Finance Division for their records. Compile the grant closeout package and notify any subcontractors of the deadline to submit final invoices. To complete the closeout, the project manager/grant administrator shall ensure all deliverables are received within the grant period, invoices are processed, reimbursements are submitted, all revenue is received and a final reconciliation to the general ledger is completed. The project manager/grant administrator shall submit all financial, performance and other required reports prior to the established deadline. Lastly, the project manager/grant administrator shall ensure the grant record retention requirements are met.