**Reason for Policy**

To outline guidelines for the submittal of grant applications and the acceptance of grant awards (Federal, State or Local) or any non-grant Federal funding on behalf of the Village of Pinckney.

**Policy Statement**

The municipality will maintain grant information and accounting to facilitate the annual audit and compliance with federal and state grant requirements.

**Policy Procedure**

1. Application for Grants – All grant applications must be approved by the Village Council before submission for the grant. Contact the President, or designee, for assistance in determining appropriate wording for the resolution as well as to discuss grant matches or other potential grant requirements. See Appendix A for required information for grant applications.
2. Village Council Approval of the Award - The resolution should authorize the acceptance and administration of the grant and confirm either that the grant award and conditions are not substantially changed from the application or note any changes from the application. The resolution must also establish the appropriate expenditure accounts and appropriate any funds required.
3. Internal Controls over Federal Grant Awards- After the grant is awarded, review the grant award documentation with the President. ***No funds will be expended until all internal documentation has been completed.***  In this meeting, the President, or designee, will review the Grant Project Checklist (see Appendix C) with the grant administrator. The grant administrator will be appointed by the President. The Checklist gathers information prior to the grant being set up in the financial system or any procurement activities/other incurred direct costs. Periodically, throughout the life cycle of the grant, the President, or designee, will meet with the grant administrator to ensure compliance with the grant agreement. Areas of internal controls that will be reviewed include:
   1. Procurement of good and services
   2. Allowability of Costs - Documentation of costs charged to the grant must demonstrate the allowability under the grant agreement. The grant administrator is solely responsible for understanding the costs allowed under the grant.
   3. Payroll and Fringes - Documentation of charges for payroll and fringes charged
   4. Cash Management - Cash draws must be made timely in accordance with the grant agreement. Draws should be requested no later than 30 days after the end of the quarter. All draws must be reviewed by the President, or their designee, prior to requesting Federal money. The Treasurer, or their designee, is the only authorized requestor of Federal and State grant reimbursement. No other staff is authorized to draw down funds on behalf of The Village of Pinckney. This includes funds drawn through the State of Michigan LARS system.
   5. Indirect Costs - Under no circumstances, should The Village of Pinckney apply for an indirect cost rate when applying for a grant, or accept reimbursement for indirect costs without discussing the implications with the President, or designee.
   6. Authorization, Approvals and Documentation - For each transaction charged to the grant, the grant administrator is certifying the cost is allowable under the grant when the request for reimbursement is given to the President. Documentation to support the request must match the financial system and all related backup must be attached to the grant request including invoices, receipts, time and attendance reports and other related documentation.

For more information on the Uniform Grant Guidance requirements, please visit:

<https://www.federalregister.gov/articles/2013/12/26/2013-30465/uniform-administrative-requirements-cost-principles-and-audit-requirements-for-federal-awards>

* 1. Grant Award Information Required for the Annual Audit - The grant administrator will provide the President with the following information (if applicable) (*See Appendix B* – for the *Summary of Grant Information* Form to attach with contract & resolution):

1. Grant name and program description.
2. A copy of the grant application.
3. A copy of the Village Council resolution approving the grant
4. Funding agency. (If the funding agency is a State agency, the grant administrator must note whether the funds are pass-through funds from the Federal government.)
5. Catalog of Federal Domestic Assistance number, if grant award is Federal
6. Grant number.
7. Program amount requested.
8. Grant administrator contact person (name, title, and phone-number).
9. Financing Information
   * 1. Source of funds (grantor, amount)
     2. Use of funds (type of expenditure, amount)
     3. Grant expiration (length of time account will be needed)
     4. Relationship to other grants/projects

For example, if the Village Council approved a grant contract for a consultant study of land use, with total funding of $100,000 (Federal grant, $80,000; State grant, $15,000; local grant match, see the financial information furnished to the President below:

Source of Funds

Federal Funds $80,000

State grant $15,000

Municipality Funds $ 5,000

**Total $100,000**

Use of Funds

Consultant services $100,000

Total $100,000

The grant administrator in consultation with the President, or designee, would then set up the grant in the financial system using specific general ledger account numbers.

* 1. Grant Close Out Documents - After the terms of the grant have been satisfied, all necessary documents to close out the grant shall be prepared on a timely basis. Copies of all grants close-out documents (final reports) should be provided to the President after the final reimbursement is requested.



|  |  |  |  |
| --- | --- | --- | --- |
|  | Yes | No | N/A |
| Does the grant require matching funds? If yes, how much? |  |  |  |
| Does the grant require a budget adjustment from the Village Council? |  |  |  |
| If the grant funds FTEs, is there a requirement to retain those employees for a certain period of time? If yes, how many years? |  |  |  |
| If the grant funds capital outlay, is there a requirement to track the equipment for a certain number of years after the grant award? If yes, how many? |  |  |  |
| If the grant has special reporting requirements, have those been discussed with Finance? |  |  |  |
| If the grant has special banking requirements to receive funding, have those been discussed with the Treasurer? |  |  |  |
| Are there other commitments that the Village of Pinckney will be making if this grant is awarded? |  |  |  |

Submitted by:\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_Date:\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

President Approval: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_Date:\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Return Completed Form to the Finance Director after all approvals are obtained.

## Appendix B

# Summary of Grant Information

Funding agency (if a State agency, it is also important to note if these are pass-through funds)

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Grant name and program description and Project Name/File Number (if applicable):

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Catalog of Federal Domestic Assistance Number: \_\_\_ \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Grant Number: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ \_\_\_\_\_\_\_ \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Program Award Amount: $\_\_\_\_\_\_\_\_\_\_\_\_\_ \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Accounting information:

GL Accounts:­­­­­­­­\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Expected expenditure amount $\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Please attach copies of the following:

* + grant application
  + approved resolution
  + grant award letter/contract
  + grant closeout documents (if applicable)

Grant contact person (name, title, phone #): \_\_\_\_\_\_\_\_\_\_\_ \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

**Return Completed Form to the President or Designee.**

# Appendix C-Sample Grant Checklist

Department:

Federal Agency Awarding Grant:

Grant Amount:

Grant Name and GL Account:

General Questions

Are you a direct recipient or a pass-through entity? (200.330)

Are you passing through funding to other agencies? (200.331)

Have you received your Federal Award Identification Information? If so, provide a copy to the President. If not, obtain your information and bring it to the President.

Is your grant construction related? If yes, discuss specific construction requirements here.\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Does your grant award include a grant match (200.306)? If so, how much and what is the source of the match?

Does your grant generate any program income (200.307)?

What is your period of performance (200.309)?

Does your grant involve the purchase of real property (200.311)?

Does your grant involve the purchase of equipment (200.313)?

Does your grant involve the purchase of supplies (200.314)?

Does your grant involve the purchase of intangible property (200.315)?

Does your grant allow for indirect costs (200.416)?

Does this Grantor Agency have specific additional requirements above Uniform Grant Guidance? If so, summarize here.

Procurement (200.318 to 200.326)

Prior to Bidding

Notify Procurement that bid/proposal has Federal grant funding

Does your Grantor agency require a review of your bid/proposal specifications? If so, date review was complete:

Demonstrate bid avoids purchasing unnecessary or duplicative items

Demonstrate consideration of intergovernmental procurement agreements

Demonstrate consideration of Federal excess and surplus property

Demonstrate compliance with the recycled/recovered content per the EPA guidelines

Demonstrate steps were taken to contract with small and minority businesses, women’s business enterprises, and labor surplus area firms

Include Federal Funding Reference in project solicitation

Include Required Bid and Contract Documents Packet in bid packet

Demonstrate compliance with APP 207, ***Procurement Standards for Federal Grants***

During Project Bidding Process

Bid advertisement date:

Pre-bid meeting date (if applicable):

Confirm no mandatory meetings were required

After Bid Opening

Provide analysis to the President of economical purchases (i.e. lease vs. buy, consolidation of procurements, use of surplus property.)

Provide the President with a copy of the bid tabulation/proposal scoring for grant file

Date Conflict of Interest was received

Provide the President evidence of review of Federal Debarment List located at [www.sam.gov](http://www.sam.gov) before contract award

Award Period

Provide the President with a copy of the contract award letter and Village Council resolution.

Provide the President with how contractor oversight will be maintained.

Provide the President with a copy of the Performance Bond (if required).

For Quarterly/Semi-Annual Financial Reporting, were your reports filed in a timely manner? (200.327) Dates filed:

For Annual Financial Reporting, was your report filed in a timely manner? (200.327) Date filed:

For monitoring and reporting program performance, were your reports filed at the interval required by the Grantor agency with 90 days after the reporting period? (200.328)

Submit a completed Reimbursement Request Form with the following information attached:

Copy of invoice

Copy of proof of payment

Any other relevant backup documentation (if applicable) or  N/A

Post-Award Closeout (200.343-200.345)

Closeout submitted within 90 days of the end of the performance period

**To be completed by the President in conjunction with the Grant Administrator.**