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1.0 Purpose

This policy establishes a framework for the County to seek, receive, and expend grant funds. The policy applies to all aspects of a grant award, including:

- Identifying available grants
- Developing and submitting grant applications
- Accepting grant awards & receiving grant dollars
- Expending grant funds
- Managing grant programs, reporting, and compliance
- Closing grants upon completion of the grant funded program

This policy references accompanying Standard Operating Procedures, the *Grants Manual*. The *Grants Manual* is designed to aid departments and ensure compliance with this policy.

2.0 Applicability

This policy applies to all Buncombe County departments and employees. Where there is conflict with any department-specific policy, this document will supersede.

3.0 Policy

3.1 Grant Approval Requirements

3.1.1 County Manager Approval

Approval by the County Manager or an elected official who manages operation of a County office, or designee thereof, is required to *apply for* any grant. The County Manager reserves the right to require higher approval, such as that of the County Commission, to apply for grant funds.

3.1.1.1 For grants of \$500,000 or more and for grants of any amount if creating new positions, County Manager approval must be obtained before applying. The grant should be presented to Manager's Advisory Group via written notification or as a meeting agenda item if time allows.

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3.1.1.2 For grants of less than \$500,000, the County Manager has designated Assistant County Managers as approvers.

- 3.1.1.3 For grants of less than \$30,000, the County Manager has designated Department Directors as approvers.
- 3.1.1.4 Approvers reserve the right to escalate approval decisions.
- 3.1.1.5 Some grants require County Commission or other specific approvals prior to applying, so additional pre-application approvals may be necessary.
- 3.1.1.6 In some cases, there is not a grant application (such as when grants are structured with Buncombe County as a subrecipient receiving pass-through awards from third-party entities), so no pre-application approval is necessary.

3.1.2 **Board Approval**

3.1.2.1 County Commission approval is required to <u>accept and receive</u> all grant funds. Grant funds must be included in the adopted budget ordinance or approved through a budget amendment.

3.2 Application Approval Process

3.2.1 **Grant Application**

- 3.2.1.1 Application for grants must obtain County Manager or designee approval prior to application.
 - 3.2.1.1.1 "Non-competitive or formula-based" grants may be approved through the annual budget process.
 - 3.2.1.1.2 "Intergovernmental" grants may be approved through the annual budget process, with an exception granted by the County Manager.
 - 3.2.1.1.3 All other grants may be approved using a Grants Justification Form procedure.

3.2.2 Grant Conditions Change

- 3.2.2.1 If grant conditions change between grant application and award notification, County Manager or designee approval is required prior to seeking Commission approval for acceptance of funds.
- 3.2.2.2 This applies to all competitive grants.

3.3 Applicant Responsibilities

- 3.3.1 **Prior to application**, the applicant department must:
 - 3.3.1.1 Ensure a prospective grant aligns with County priorities, such as those adopted in the Buncombe County strategic plan or other County-adopted plans.
 - 3.3.1.2 Conduct a multi-year cost-benefit analysis, which shall consider the period from grant award to at least one year after grant funds expire.

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3.3.1.3 Provide a summary of the grant application to the Budget, Finance, and Strategic Partnerships departments for review prior to application submission.

- 3.3.1.4 Provide a summary of the grant application to the Human Resource department for review prior to application submission, if the grant will fund personnel (full or partial).
- 3.3.1.5 Provide a summary of the grant application to the Information Technology department for review prior to application submission, if the grant will fund technology.

3.3.2 **After award but prior to implementation**, the grant manager must:

- 3.3.2.1 Provide a line-item budget to the Budget and Finance departments to assist in preparing any necessary budget amendment and setting up the grant and appropriate worktags in the County's accounting system.
- 3.3.2.2 Consult with the Finance department regarding risk assessment of subcontractors, if the grant includes subrecipients, in compliance with Federal Office of Management and Budget (OMB) Circulars.

3.3.3 **Prior to grant closure,** the grant manager must:

- 3.3.3.1 Notify the Budget, Finance, Human Resources, and Strategic Partnerships departments the grant is reaching closure.
- 3.3.3.2 Ensure grants are within budget and balance expenditures and revenues.

3.3.4 Reporting, Compliance, & Program Management

- 3.3.4.1 The department receiving grant funds is responsible for reporting, compliance, & program management requirements.
- 3.3.4.2 Support departments will assist when requested, but are not responsible.

3.4 Compliance with other laws, rules, regulations, and policies

- 3.4.1 All grant applicants and County personnel must abide by all applicable laws, rules, and regulations.
- 3.4.2 All donations or contributions shall abide by the *Buncombe County Donation Policy*.
- 3.4.3 All grants that fund employees (partially or in full) shall abide by the *Buncombe County Grant Funded Positions Policy*.

4.0 Policy Non-Compliance

Employees willfully violating the terms and conditions of this policy may be subject to appropriate disciplinary action, up to and including dismissal.

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5.0 Audit

All policies for Buncombe County may be subject to audit or review as outlined in the <u>Internal Auditor's Statement</u>.

6.0 Definitions

- 6.1 **Buncombe County Grants Manual** an accompanying Standard Operating Procedures document that provides guidance to ensure compliance with this policy.
- 6.2 **Grant** financial assistance from an external entity to carry out a public purpose. This includes federal, state, and "pass-through" dollars.
 - 6.2.1 Annual grant a grant that is awarded annually, regardless of the specific grant period (e.g., County fiscal year, federal fiscal year, or calendar year).
 - 6.2.2 **Multi-year grant** a grant that affects the appropriation of funding beyond one (1) fiscal year.
 - 6.2.3 **Intergovernmental grant** a grant that is provided to the County by another government entity.
 - 6.2.3.1 **State or federal grant** a subset of intergovernmental grants, a grant that is provided to the County by either a state government or the federal government.
 - 6.2.4 **Private grant** a grant that is provided to the County by a private entity.
- 6.3 Grant management phases include, but are not limited to, application, acceptance, implementation, active, and closure.
- 6.4 **Grant applicant** the department and individual designee responsible for grant application.
- 6.5 **Grant manager** the department and individual designee responsible for overseeing grant activities.
- 6.6 **Donation** gift or transfer to the County of real or personal property, cash, or cash equivalents without the exchange, offset, or expectation of money or other consideration to balance the transaction; all donations are assumed to be voluntary and irrevocable.
- 6.7 **Funding that is not a grant** in some cases, a grantor will refer to their gift as a "grant" or will require an application to receive funds. However, Buncombe County may consider the funding to not be a grant under the following circumstances:
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• Cash funding that does not have a performance or contract agreement

- Cash funding that does not have reporting requirements
- Goods, services or materials provided directly to the County from the donor (i.e., County does not use grantor's funds to buy the materials).

Typically, such funding should be received and budgeted in the department's operating budget or in a revolving fund program.