

TOWN OF COLLIERVILLE GRANT POLICY MANUAL

•PURPOSE AND APPLICABILITY

This *Grant Policy Manual* (GPM) is a compendium of basic Town of Collierville policies and procedures for use by the grantee community and Town staff. Its coverage includes the award process, from issuance and administration of an award through closeout. The GPM is periodically revised to update existing information, reflect changes in Town policies and procedures, and incorporate additions or changes in applicable State statutes or regulations. The Town website (www.collierville.com) will always display the most current version of the GPM. This manual explains various requirements and is applicable to all Town of Collierville grants. It contains the following topics:

- PROPOSAL SUBMISSION AND MERIT REVIEW
- AWARD AND FUNDING
- MONITORING PROJECT PERFORMANCE
- STANDARDS FOR FINANCIAL MANAGEMENT
- REPORTING REQUIREMENTS
- RECORDS RETENTION AND AUDIT
- CHANGES IN PROJECT DIRECTION OR MANAGEMENT
- CHANGES IN THE GRANT BUDGET
- HANDLING OF INFORMATION
- SUSPENSION AND TERMINATION PROCEDURES
- GRANT CLOSEOUT

•PROPOSAL SUBMISSION AND MERIT REVIEW

Submission

The applicant must submit an application (Town of Collierville Application Form) and may be asked to submit additional information. Applicants must also make a presentation before the Board of Mayor and Aldermen in anticipation of an award. However, such requests do not guarantee that an award will be made. Following review of all applicable information, the Board will determine whether an award can be made and the appropriate level of funding.

Review

Applications that the Town may fund are reviewed for a number of considerations. These include, as applicable, alignment with the Town's funding policy, review of the project budget, assessment of the applicant's management systems, and determination of applicant eligibility and compliance with policy requirements.

•AWARD AND FUNDING

The Town awards grants on the basis of reasonable and allowable costs consistent with the principles of sound cost management and in consideration of Town priorities (e.g., program relevance) and available funds.

Funding

The grant award provides funds for the twelve months of the fiscal year beginning July 1 through June 30 of the year in which the grant funds are budgeted. A Letter of Agreement shall be executed between the Town and the agency receiving grant funds detailing the benefits to the Town from the grant and outlining the program of work to be funded.

TOWN OF COLLIERVILLE GRANT POLICY MANUAL

•MONITORING PROJECT PERFORMANCE

- a. A grantee has full responsibility for the conduct of the project or activity supported under a Town of Collierville grant and for the results achieved. The grantee should monitor the performance of the project to assure adherence to performance goals, time schedules or other requirements as appropriate to the project or the terms of the grant. In order to carry out these responsibilities, each grantee organization shall agree to comply with the applicable requirements for grants and to the prudent management of all expenditures and actions affecting the grant. Documentation for each expenditure or action affecting the grant shall reflect appropriate organizational reviews or approvals, which should be made in advance of the action. Organizational reviews are intended to help assure that expenditures are allowable, necessary and reasonable for the conduct of the project, and that the proposed action:
 1. is consistent with grant terms and conditions;
 2. is consistent with Town and grantee policies;
 3. represents effective utilization of resources; and
 4. does not constitute a change in objective or scope.
- b. Notwithstanding these responsibilities, the Town continues to encourage communication between the Town's Program Officer (PO) and the grantee's Project Director (PD) on the progress of projects supported by the Town as well as on project changes.
- c. The Town, through authorized representatives, has the right, at all reasonable times, to make site visits to review project accomplishments, grantee management control systems and administration and management of the grant and to provide technical assistance as may be required.

•STANDARDS FOR FINANCIAL MANAGEMENT

The acceptance of a grant from the Town of Collierville creates a legal duty on the part of the grantee organization to use the funds made available in accordance with the conditions of the grant. Payments may be made in advance of work performed or as a reimbursement for work performed and/or costs incurred by the grantee. However, payments may not be made in advance of a grant agreement being signed by a Town official for the project period. The Town has a reversionary interest in the unused balance of advance payments in any funds improperly applied (whether or not received as an advance payment).

•REPORTING REQUIREMENTS

The Town requires project reports for all assistance awards. These reports also provide the Town Program Officers and administrative offices with information on the progress of supported projects and the way these funds are used. Information in these reports may be made available to the general public through the Freedom of Information Act (FOIA). Unless otherwise specified in the Grant Agreement, project reports shall be submitted to the PO quarterly and at least three months prior to the end of the current budget period. Failure to submit timely reports may delay processing of funding increments. Within 90 days following expiration of the grant, a final project report must be submitted. In addition, the grantee also shall provide to the Program Officer, within 90 days following the expiration of the grant:

TOWN OF COLLIERVILLE GRANT POLICY MANUAL

- any unique reports or other end items specified in the award, including any reporting requirements referenced in the award as being directly related to either the award or the administration of the award.
- a final cost share notification documented and certified by the Authorized Organizational Representative.

•RECORDS RETENTION AND AUDIT

- a. Financial records, supporting documents, statistical records and other records pertinent to a grant will be retained by the grantee for a period of three years from submission of the Final Project Report.
- b. Unless court action or audit proceedings have been initiated, the grantee may substitute electronic copies of original records.
- c. The Town or any of their duly authorized representatives, shall have access to any pertinent books, documents, papers and records, of the grantee organization to make audits, examinations, excerpts and transcripts.
- d. In order to avoid duplicate recordkeeping, the Town may make special arrangements with grantees to retain any records which are needed for joint use. The Town may request transfer to its custody of records not needed by the grantee when it determines that the records possess long-term retention value. When the records are transferred to or maintained by the Town, the three-year retention requirement is not applicable to the grantee.
- e. It is the responsibility of grantees to arrange for the conduct of audits as required by the Town's Grant Policy. They shall provide copies of the reports of these audits to the Town.

•CHANGES IN PROJECT DIRECTION OR MANAGEMENT

Changes in Project Objectives or Scope

The objectives of the project stated in the proposal should not be changed without prior Town approval. If approved by the Town, the Grant Agreement will be amended.

Significant Changes, Delays or Events of Unusual Interest

In the event there are problems, delays or adverse conditions that will materially affect the ability to attain the objectives of the project or to meet such time schedules as may have been proposed, appropriate grantee officials should notify the Town PO.

Changes in PD Devoted to the Project

The Town's decision to support or not to support a proposed project is based to a considerable extent upon its evaluation of the proposed PD's capabilities to conduct the project in an efficient and productive manner. The named PD should be continuously responsible for the conduct of the project and be closely involved with the effort.

1. If the PD plans to, or becomes aware that he/she will: (a) devote substantially less effort to the project than anticipated in the approved proposal; (b) sever his/her connection with the grantee organization; or (c) otherwise relinquish active direction of the project, he/she shall advise the appropriate official at the grantee organization, who shall initiate action appropriate to the situation under the guidelines that follow.

TOWN OF COLLIERVILLE GRANT POLICY MANUAL

- a. If the PD will be absent from the project for short periods of up to three months, he/she shall notify appropriate officials of the grantee organization. The grantee shall then notify the Town Program Officer of arrangements for conduct of the project during the PD's temporary absence.
- b. In the event the PD will be away from the project for a period greater than three months (e.g. sabbatical leave) but intends to return, arrangements for oversight of the project shall be sent to the Town for approval. This information must be provided at least 30 days before departure or as soon as practicable after the prospective absence is known. The Town Program Officer will provide written approval to the grantee if the arrangements are satisfactory, but no formal amendment to the grant will be made.
- c. If the arrangements are not satisfactory to the Town, the grant may be terminated.

Change in Person-Months Devoted to the Project

If the PD will devote substantially less time to the project than anticipated in the proposal, (defined as a reduction of 25% or more in time) he/she should consult with appropriate officials of the grantee organization and with the Town Program Officer. If either determines that the reduction of effort will substantially impair the successful execution of the project, the PO will inform the Town Administrator who may:

- a. request the grantee to nominate a replacement PD acceptable to the Town
- b. initiate the termination procedures; or
- c. negotiate an appropriate modification to the grant.

Withdrawal of PD

In the event the PD severs his/her connection with the grantee organization or otherwise relinquishes active direction of the project, the grantee must notify the Program Officer and either:

- a. nominate a substitute; or
- b. initiate grant closeout procedures through submission of final reports.

Substitute PD

In the event the grantee desires to continue the project with a substitute PD, the appropriate officials at the grantee organization must advise the Town Program Officer of the substitute PD's name and qualifications. If approved by the Town, the Grant Agreement will be amended. If not approved, the Town may suspend or terminate the grant.

•CHANGES IN THE GRANT BUDGET

Grant Changes and Approvals

If required in furtherance of the project, the grantee may request a transfer of funds from one budget category to another for allowable expenditures. The request should clearly state which budget items, if any, are to be changed and by what amounts, and should explain the reasons for any changes.

TOWN OF COLLIERVILLE GRANT POLICY MANUAL

•HANDLING OF INFORMATION

Open Government Legislation

- a. Pursuant to the Freedom of Information Act (FOIA) (5 USC §552), the Town will provide agency records, with certain exceptions, if the request is in writing, includes the requester's name and mailing address, is clearly identified as a FOIA request, and describes the records sought with sufficient specificity to permit identification. The requester must also agree to pay fees that are chargeable according to the Town's current Fee Schedule.
- b. The Government in the Sunshine Act (5 USC §552b) requires that all meetings of the Board of Mayor and Aldermen be open to public observation unless the subject falls within one of ten exemptions. The Sunshine Act and the FOIA cited above, may require the Town to release to the public information, correspondence and documents received by the Town from grantees, unless they fall within the Acts' limited exceptions.

•SUSPENSION AND TERMINATION PROCEDURES

- a. A grant may be suspended or terminated in whole or in part in any of the following situations:
 1. when the grantee has materially failed to comply with the terms and conditions of the grant;
 2. when the Town and the grantee by mutual agreement (if the Town and the grantee cannot reach an agreement, the Town reserves the right to unilaterally terminate the grant); or
 3. when the grantee on written notice to the Town setting forth the reasons for such action, the effective date, and, in the case of partial termination, the portion to be terminated or suspended (with the understanding that if the Town determines that the unterminated portion will not accomplish the purposes of the grant it may suspend or terminate the entire grant).
- b. Normally, action by the Town to suspend or terminate a grant will be taken only after the grantee has been informed by the Town of the proposed action, or informed of any deficiency on its part and given at least 30 days to correct it. However, the Town may immediately suspend or terminate a grant without notice when it believes such action is reasonable to protect the interests of the government.
- c. No costs incurred during a suspension period or after the effective date of a termination will be allowable, except those costs which, in the opinion of the Town, the grantee could not reasonably avoid or eliminate, or which were otherwise authorized by the suspension or termination notice, provided such costs would otherwise be allowable under the terms of the grant and the governing cost principles.
- d. Within 30 days of the termination date the grantee will furnish a summary of progress under the grant and an itemized accounting of costs incurred prior to the termination date or pursuant to c, above. Final allowable costs under a termination settlement shall be in accordance with the terms of the grant, including this section, and the governing cost principles, giving due consideration to the progress under the grant. In no event will the total of Town payments under a terminated grant exceed the grant amount.
- e. A notice of termination other than by mutual agreement and/or the final settlement amount may be subject to review.

TOWN OF COLLIERVILLE GRANT POLICY MANUAL

Procedures for Suspension or Termination

- a. When it is believed that a grantee has failed to comply with one or more of the terms and conditions of a grant, the Town will advise the grantee in writing of the nature of the problem and that failure to correct the deficiency may result in suspension or termination of the grant. The grantee will be requested to respond in writing within 30 calendar days of the date of such letter, describing the action taken or the plan designed to correct the deficiency. Copies of such correspondence will be furnished to the PD and to the Town Program Officer. However, the Town may immediately suspend or terminate a grant without notice when it believes such action is reasonable to protect the interests of the government.
- b. If a satisfactory response is not received within the above period, the Town may issue a notice immediately suspending authority to further obligate grant funds, in whole or in part. Notice of suspension is sent by certified mail (return receipt requested) to the Authorized Organizational Representative, with a copy to the PD. Within the Town, copies are furnished to the Program Officer. The notice will set forth the terms of the suspension and its effective date.
- c. Normally, the suspension will remain in effect for a maximum of 60 days to allow the grantee to take corrective action. In the event that the deficiency is not corrected to the satisfaction of the Town, the Town may issue a notice of termination, addressed as in b., above. The notice will set forth the reasons for the action and its effective date.

Termination by Mutual Agreement

Circumstances may arise in which either the Town or the grantee wishes to terminate a project. If both parties agree that continuation of the project would not produce results commensurate with the further expenditure of funds, or if there arises any other reason, the grant may be terminated by mutual agreement.

Procedures

- a. If the grantee wishes to terminate the project, the Authorized Organizational Representative should advise the Town in writing and send a copy to the Program Officer.
- b. If the Town wishes to terminate the project, the Town will advise the grantee's Authorized Organizational Representative in writing and send copies to the PD and the Program Officer.
- c. Within 30 days after receipt of request from either party for termination by mutual agreement, the other party will provide an appropriate written response. In the event of disagreement between the parties, the Town will make a final decision.
- d. Following termination, grant closeout procedures will be initiated.

•GRANT CLOSEOUT

Grant closeout is the process by which the Town determines that all applicable administrative actions and all required work of the grant have been completed. Grants will be closed upon receipt of the final disbursement information and after determination that all other administrative requirements in the grant have been met. In the event a final audit has not been performed prior to the closeout of the grant, the Town reserves the right to recover appropriate amounts after fully considering the recommendations on disallowed costs resulting from the final audit.