ROCKDALE COUNTY, GEORGIA

Grants Policy Manual

Version 1.0

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1 INTRODUCTION

The purpose of the Policy Manual is to provide a uniform method of applying for and managing grants as well as to outline how to remain in compliance with local, state and federal regulations. Specifically, policies reflect the "rules" governing the components of grant funding. Procedures represent an implementation of policy and should evolve over time as new tools emerge, new processes are designed and risks change due to environmental changes.

The definition of a grant for purposes of this policy is as follows: An award of financial assistance in the form of money or property by a funding source including the federal government, state government, other local governments, non-profit agencies, and private businesses and citizens that the County of Rockdale Board of Commissioners (the County) has the power to accept or reject.

The structure of this manual outlines the three main sections; Preapplication, Operational and Compliance. The policies and procedures outlined in this document are intended to be a basic guideline and constantly evolving, thus regular updates can be expected.

1.1 Rockdale County Grants Management

Rockdale County grants are managed by the Finance Department to streamline grants awarded to the County. The process involves documenting all grant awards in which Rockdale County Government is named grantee, creating and maintaining a comprehensive database of grant award information, distributing pertinent information to grant coordinators, recipients and sub recipients, ensuring that grants are compliant based on programmatic, financial and legal guidelines, and serving as a resource to County departments. The Finance Department serves two core areas: Grants Management and Grants Compliance.

Objectives of the Finance Department involve evaluating grant program accountabilities, maintaining County-wide grant data, assisting departments with grant related documents, questions or concerns, and serving as a liaison to local, state and federal agencies in the management of grants per the direction of County administration.

1.2 Purpose of the Grants Policy Manual

Rockdale County Government is responsible for applying uniform methods to the application, management and compliance of all grant funded revenue. In an effort to sustain the County's mission involving grants, policies and procedures governing the components of grants management must be documented and communicated County-wide. The Rockdale County Finance Department serves to establish grants policy and procedures, and update them as new tools emerge; new requirements are introduced by grantor agencies and as risks evolve in response to internal or external change. The centralized oversight of County grants is designed to increase the overall effectiveness of Rockdale County grants management.

Effective September 27, 2016 the policies and procedures set forth herein are to be applied to all federal, state and other grant funded projects wherein Rockdale County Government is named grantee.

Departments throughout Rockdale County Government will receive a Rockdale County Finance Department grants manual and will be supplied subsequent updates upon release by Finance. An acknowledgement of receipt will accompany each grants manual and update that is to be signed and returned to Finance by department directors and elected officials upon their receipt of a manual or update.

1.3 Grants Administration

Rockdale County Board of Commissioners is the official grantee signatory for all grants, regardless of the division or department managing the grant program.

Rockdale County staff and any subgrantees are responsible for fulfilling all aspects of the grant contract including administrative, programmatic, and financial components while adhering to all governing authorities that legally bind Rockdale County Government to the Grantor through a grant agreement.

1.3.1 Grants Management - Each department or agency shall budget and manage its grant funds in accordance with the grantor's and the County's fiscal policies. Compliance with special conditions or any other grantor requirement/guidance as outlined in the grant shall be the responsibility of the department or agency obtaining the grant. The department should coordinate with other county departments in a timely manner to fulfill any unique stipulations associated with the grant.

1.3.2 Budgeting - As applicable, grants should be incorporated into the County's budget process. This is separate from the initial BOC agenda process requesting authorization to solicit, apply, accept and budget for the grant. Differences in the grant amount awarded and the budgeted amount adopted by the BOC will require a budget adjustment via the BOC agenda process. The department or agency should work with the Finance department in determining adjustment(s) needed.

1.3.3 Procurement - All purchasing policies and procedures shall be followed, as they apply, for the purchase of goods, services, or construction made with grant funds.

1.3.4 Personnel - All human resource policies and procedures shall be followed, as they apply, for the administration of the grant award including but not limited to compliance with the Equal Employment Opportunity Plan requirement.

1.3.5 Accounting/Reporting – Grant recipients shall be responsible for the following:

a) **Expenditure Control** – only grant-related expenditures shall be charged to the grant account. All expenditures must meet the authorized use of funds as per the grant agreement. Finance must be notified and provided documentation required to record capital equipment or fixed assets. Departments shall not use grant funding to supplant County funds.

b) **Reporting** – the department or agency shall ensure all procedures and requirements are followed in preparing and submitting financial and project reports, reimbursement requests, close out reports and any other documents as outlined in the grant agreement in a timely manner.

c) **Supporting Documentation** - the department or agency shall provide Finance additional information needed to support grant transactions including:
- All correspondence with the grantor
- Grant agreement
- Amendments
- Extension requests and authorizations
- Requests for reimbursement with summary backup
- All reports – financial, program/project related
- Close out reports

1.4 Certifications

The Finance Department is responsible for maintaining certain certifications on behalf of Rockdale County Government, including but not limited to the DUNS number and registration within System for Award Management (SAM). The Finance Department will monitor and maintain all necessary certifications within SAM.

2 PRE-AWARD

County staff should notify the Finance Department of significant grant related activities such as: grant planning, grant submission, grant approval, grantor site visits, grantor program reviews, key staff changes, misconduct involving grant program financials or programmatic activities, client complaints, etc. These notifications allow the Finance Department to track County grant initiatives more effectively during the lifecycle of a grant. All notifications should be directed to the Grants Compliance Officer.

2.1 Pre-Application

2.1.1 Planning

Before an application for funding can be created a department should know its needs and how to find resources to meet those needs. It is best to develop departmental strategic plans before reviewing available solicitations. This will minimize the tendency to 'chase grants' and institute grant funded programs that are not a good fit for the department.

Departmental planning can be conducted in different ways and can be formally orchestrated or informally noted. Conducting a needs assessment with the end users is the most efficient way to document needs. Informally, focus groups or round table discussions concerning gaps in service or function can be discovered. During the planning process it is important to communicate with internal and external customers as the opportunities could be interrelated.

It is important to note during the planning process to inquire about what has and has not been successful in the past, on a local, state and national level. Model programs may exist in other communities and can be a valuable planning resource. Likewise, if past performance does not appear to favor positive future results, the planning process should address ways in which the future project will not replicate the past.

2.1.2 Solicitations

There are many places to research available grants. Usually, federal and state governmental agencies have an interest in notifying subordinate areas of available resources as quickly and efficiently as possible. The BOC encourages the pursuit

of any such grants provided that all fiscal implications, such as matching funds and continuing costs, are clearly identified in advance. Departments should seek assistance from the Grants Management Coordinator for available grant opportunities.

2.2 Grant Application Process

Given sufficient notice the Finance Department can assist in the construction and coordination of a grant application. As a best practice, all County staff shall notify the Rockdale County Grants Management Coordinator and Grants Compliance Officer prior to a grant application being submitted wherein Rockdale County Government is named grantee.

➢ **NOTE**: The application and a signed Grant Budget Summary Form must be submitted to the Finance Department for prior approval.

2.2.1 General Description

The Rockdale County Finance Department is the conduit through which the grant process flows from department staff to administration. The procedures outlined herein should be followed for all grant applications from every County Department and agency.

2.2.2 Grant Application Procedure (Internal Applications)

a) Identification. Potential grant funding sources might be identified by department staff or by staff of the Finance Department through a variety of sources including government and private publications, Internet research, or other means.

b) Notification. When a grant opportunity is identified and any County department is interested in applying, the Finance Department should be notified. Notification should include:

1) Source of grant funding.
2) Department interested in applying and department contact.
3) Estimated amount of funding to be requested.
4) Application due date.
5) Summary of project to be funded.
6) List of potential "partners" to be included.

c) Review of applicability and compliance. Finance Department staff will review the information provided to determine suitability of proposed program to meet the grant guidelines. Staff will also review required assurances to ensure County's ability to comply. Review process should take no more than seven (7) to ten (10) days unless additional research of the grant program is needed. Feedback will be provided to the department regarding suitability and/or any potential compliance issues.

d) Matching, Level of Effort and Earmarking.

1. Matching or cost sharing includes:
   a. Requirements to provide contributions (usually non-Federal) or a specified amount or percentage of match Federal awards.
   b. Matching may be in the form of allowable costs incurred or in-kind contributions (including third-party in-kind contributions).

2. Level of effort includes:
   a. A specified level of service to be provided from period to period.
   b. A specified level of expenditures from non-Federal or Federal sources for specified activities to be maintained from period to period.
   c. Federal funds to supplement and not supplant non-Federal funding of services.
3. Earmarking includes:
   a. Departments are required to document the minimum and/or maximum amount of percentage of the program's funding that must/may be used for specified activities, including funds provided to subrecipients.
   b. Earmarking may also be specified in relation to the types of participants covered.

Adequate documentation will be maintained to support compliance with matching, level of effort, and earmarking requirements. Such information will be made available to administration, auditors, and pass-through or grantor agencies, as requested.

e) Distribution to other department staff. When appropriate, grant information will be disseminated to other department directors, elected officials and county personnel, promoting an opportunity to include other programs where appropriate, thus strengthening the application, and to avoid duplication of effort or competition among departments for available grants. Feedback from other departments and potential collaborations identified will be forwarded to the initiating department.

f) Grant development process. The Finance Department will work directly with department staff on the grant application to whatever extent is necessary and appropriate. Some of the services provided will include:

1) Provide technical assistance on compliance issues such as EEO plans; Title VI; Lobbying issues and Drug Free Workplace programs.
2) Research ideas from other cities and other sources of funds.
3) Assist with bringing additional public and/or private partners to the grant process, where applicable.
4) Assist with writing performance outcome measures.
5) Serve as a central point of contact at the County.
6) Provide technical assistance in writing the application and/or completing necessary certifications and forms.
7) Facilitate the involvement of an outside grant writer or consultant when appropriate.
8) Review draft application/suggest revisions of any deficiencies.

g) Technical review. All grant applications for the County are subject to a technical review by Rockdale County Finance Department. Recommendations for revisions from Finance will be incorporated in the final application.

h) Final review and preparation for submission. The final grant application will be prepared for signatures by the department staff and submitted to the Finance Department. The Finance Department will prepare a summary memo and send the application for approval/signature to the Chairman. The departments should anticipate ten (10) business days for approval.

2.3 Approval for Electronic Submission

Grants submitted electronically do not normally require a signature from the Chairman; however, these grants are subject to the same review process outlined in Section 2.2.2g above. The final grant application will be prepared by the department staff and submitted to the Rockdale County Finance Department. The Finance Department will prepare a summary memo and send the application for approval to the Chairman. The departments should anticipate ten (10) business days for approval.

2.4 Grant Consultants

When a decision is made to hire an outside grant writer or consultant, the Rockdale County Finance Department will continue to be involved in the grant development process, serving in an advisory and/or technical assistance capacity to ensure that the administration's best interests are represented. Grant applications prepared by outside consultants may also be subject to final review by the Finance Department and are subject to the same approval process as outlined in Sections 2.2.2 and 2.3 above.

2.5 Notice of Grant Award

The means by which departments can be notified of a grant can vary. Grant award notices can be sent to the Chairman, and/or other designated Rockdale County staff via email, regular mail or facsimile transmission. Once a notice of grant award is received, project implementation begins with notifying the Finance Department.

Rockdale County staff shall forward a copy of the grant award agreement and supporting documents to the Finance Department upon receiving a grant award notice. Please include the department/department name, staff contact name, including contact information associated with the award. When special terms and conditions are attached to a grant the County department must sign and submit a Special Terms and Conditions Certification Form. Once the Finance Department has received the award documents and after BOC approval a grant fund account number will be issued.

3 OPERATIONAL

3.1 Execution

3.1.1 Grant Award Notification Procedures

All grant awards shall be reviewed by the Finance Department and Contracts Administration prior to requesting the Board of Commissioners (BOC) approval.

a) Requesting BOC Approval

County staff shall submit a copy of the Notice of Grant Award (NGA), and/or a grantor contract, with a Request for Assignment of Grant Fund Number, Route Slip for Contracts, Agreements, and MOU'S and Agenda Item Summary Form to the Rockdale County Finance Department via interoffice mail to the Grants Compliance Officer.

After the Grants Compliance Officer approves the grant award, the Finance Department will submit it to Contracts Administration requesting BOC approval and the Chairman's signature.

Grant Award Notices generally require the Chairman's signature within 10–45 days of receipt of the notice. This provides no time for delays in the procedural review, approval, and preparation of resolutions that are necessary to appropriate and expend grant funds.

b) Grants Not Requiring the Chairman's Signature
Grants that do not require the Chairman's signature or external grants that affect Rockdale County Government and/or require a letter of support and/or matching funds should be routed to the Finance Department to be reviewed and for BOC approval.

3.1.2 Automated Clearing House (ACH) Enrollment Form

Banking information for Rockdale County Government automated payments is on file with most federal and state agencies. However, with some new grants, an Automated Clearing House (ACH) enrollment form might be necessary. The form requires banking information including account numbers, routing numbers and a signature from the banking institution. If an ACH form is needed, please contact the Finance Department for assistance.

3.1.3 Purchasing

All grant related equipment and services relative to the execution of the grant should be planned for and executed during the first quarter of the grant cycle and are subject to Rockdale County Purchasing Department procurement guidelines. Documentation of goods and services purchased with grant funds should reflect the process from beginning to end and should easily show efforts of competitive bidding when applicable. Documentation of purchases should include quotes or competitive bid, requisition, Purchase Order, Invoice including invoice number and clearly communicate the amount paid, and confirmation of payment.

- NOTE: Some grant related purchases may require separate authorization from the granting agency before commencing the purchasing process. Even though a grant provides or requires the purchase of equipment or supplies you should check with the grantor before executing purchases.

3.1.4 Request for Proposals

Whenever Rockdale County issues a Request for Proposal solicitation that is grant funded, department staff shall inform potential bidders through language in the RFP that Rockdale County Government may not execute a grant-funded subaward unless they have a valid DUNS number on file.

In an effort to collect DUNS numbers on County forms, as needed to comply with the Federal Funding and Accountability Transparency Act, the New Vendor Package has been updated to collect the DUNS number of the subawardee, subgrantee or subcontractor.

3.1.5 Grant Contracts and Reporting

All grant contracts shall be reviewed by the Finance Department and Contracts Administration prior to requesting BOC approval.

a) Grant Contracts Protocol
Before County departments or agencies can provide funds to a particular vendor, contractor or sub-recipient, the following criteria must be met: 1) the grant program must authorize the distribution of funds, and 2) the County department or agency must have internal authorization from the Rockdale County Finance Department.

b) FFATA Reporting
FFATA reporting is required of all direct federal grants issued to Rockdale County Government in the amount of $25,000.00 or more, whenever a subaward transaction is issued for $25,000.00 or more, and a majority of the following (5) criteria is met as a result of payment for services. FFATA transactions are determined to be reported whenever a majority of the following criteria is met by the vendor or subawardee:

1) May determine who is eligible to receive what Federal financial assistance;
2) Has its performance measured against whether the objectives of the Federal program are met;
3) Has responsibility for programmatic decision making;
4) Has responsibility for adherence to applicable Federal program compliance requirements; and
5) Uses the Federal funds to carry out a program of the organization as compared to providing goods or services for a program of the pass-through entity.

➢ NOTE: FFATA reporting does not apply to the general procurement of goods and services.

3.2 Record Keeping

3.2.1 Time and Effort Certification

Time and effort certifications are required from all grant funded County personnel. All grant funded personnel must complete the Grant Funded Employee Time Certification Form quarterly for each grant and reflect the percentage of time performed on each grant during the quarter. The certifications must be signed by the employee and their supervisor. All completed forms are to be submitted to the Grants Compliance Officer in a timely manner. The Staff Accountant is responsible for reconciling time and effort to actual pay and making necessary adjustments.

3.2.2 Record Retention

Master grant files are to be maintained by County departments and each sub-recipient. Having organized files allows grant documents to be quickly accessed upon request by the grantor, grantee or any authorized Rockdale County Government staff member.

All grant award records are to be retained for a period of three (3) years or as stated in the grant agreement (whichever period is longer) from the date of submission of the project's final financial and performance report.

If any litigation, claim, or audit is started before the expiration of the (3) year

period, grant records shall be retained until all litigation, claims or audit findings have been resolved and final action has been taken.

3.2.3 Acceptable Grant Files

County department staff, at a minimum, should retain the following information in their grant file:

- Grant application, project abstract, narrative and budget
- Grant award notification – contract or agreement
- Resolution/exhibits approved by the BOC
- Grant program policies and procedures designed to provide assurance to achieve the following:
  - Effective and efficient operations
  - Reliable financial reporting
  - Compliance with applicable laws and regulations
- Progress reports submitted
- Financial reports submitted

3.3 Reports

3.3.1 Grant Reporting Procedures

County grant staff is responsible for ensuring that all program reports are completed and submitted on time per the grant guidelines.

3.3.2 Submitting Reports

A copy of all quarterly, semi-annual, annual, and close-out reports pertaining to a grant's progress, performance, financial or close-out shall be forwarded to the Finance Department at the same time they are submitted to the grantor agency. Please include the department/department name, department staff name, including contact information, grant program title, and the Rockdale County fund number that is associated with the grant program. The Finance Department shall maintain a file of all reports.

3.3.3 Types of Reports

a) Performance
Rockdale County Departments are required to regularly submit and retain performance reports that reflect grant funded operational progress as required by the grant.

b) Financial
Rockdale County Departments are required to regularly submit and retain financial reports that reflect a grants fiscal health as required by the grant. Invoices are expected to be submitted no more than monthly and no less than semi-annually unless otherwise noted by the grantor.

c) Close-out
Close-out documentation should be provided by the grantor. County staff are responsible for showing the grant's budget balances with Rockdale County Finance records and any discrepancies are noted in the grant files.

4 COMPLIANCE

4.1 Purpose of Compliance

The purpose of grants compliance is to promote orderly grant operations, ensuring that quality services are consistent with the grant's mission and objectives and that grant funds are used according to the project's approved application, scope of services, budget, subawards, and all other legal requirements that are associated with the grant.

4.2 Internal Oversight

It is Rockdale County Government's duty to safeguard grant funds against loss due to waste, abuse, mismanagement, errors and fraud. The Rockdale County Finance Department works to promote adherence to laws, statutes, regulations, contracts, grant agreements, policies and procedures that govern its grants. Components of an internal control environment include: 1) Risk Assessment, 2) Control Activities, 3) Information and Communication, and 4) Evaluations.

Effective grant control environments are made-up of staff that understand their responsibilities, limits to their authority, and are committed to doing what is right in a correct and timely manner.

4.3 Grant Governance

The particular grant environment governs how business is conducted. The type of grant determines the program and public policy laws, administrative, cost principles and audit requirements that are to be followed. Below is the standard hierarchy of grant governing authorities for federal grants.

All legal authorities for which the grantee or subgrantee is bound to through the grant agreement must be upheld. Therefore, it is essential to understand the legal governing of each grantor agency so that department staff and their sub-recipients are in compliance.

Rockdale County Government must comply with all relevant statues passed by Congress, state, or local government as long as they are not contradictory. When contradictory, the statute authorizing the grant program shall supersede and the grant's program manager shall be notified to confirm the accuracy of the decision.

4.3.1 Governing Authorities for Federal Grants

Direct federal grants are those in which the U.S. government is the agency granting funds to Rockdale County Government. In this scenario, Rockdale County Government is considered the grantee or pass-through agency.

a) Grant Program Guidelines/CFDA

The online Catalog of Federal Domestic Assistance (CFDA) provides access to a database of all federal programs available to state and local governments. The Catalog of Federal Domestic Assistance is a government-wide compendium of Federal programs, projects, services, and activities that provides assistance or benefits to the public. It contains financial and nonfinancial assistance programs administered by departments and establishments of the Federal government.

The primary purpose of the Catalog is to obtain general information on Federal assistance programs and improve coordination and communication between the Federal government and State and local governments. Programs selected for

inclusion in the Federal assistance data base are defined as any function of a Federal agency that provides assistance or benefits for a State or States, territorial possession, county, city, other political subdivision, grouping, or instrumentality thereof; any domestic profit or nonprofit corporation, institution, or individual, other than an agency of the Federal government.

Assurances, program compliances, and executive orders that specifically govern a grant program are also to be considered governing program guidelines.

b) Code of Federal Regulations
The Code of Federal Regulations such as particular CFR and OMB guidance that applies to the particular grant program, including uniform administrative requirements, cost principles, and audit.

4.3.2 Governing Authorities for State Grants

A grant that is funded by the U.S. government that passes through the State of Georgia to Rockdale County Government is not a direct federal grant, but instead is a federal through state grant and should adhere to state grant guidelines.

4.4 Grant Evaluations

A grant evaluation is the assessment of internal control performance over time. The purpose of evaluating is to reveal if internal controls are adequately designed, effective, and whether or not they are being properly executed. Basically, a grant evaluation is a method of providing assurance that all is well or to determine that focus is needed on specific areas.

4.4.1 Evaluation of Subrecipients

It is the department's responsibility to monitor subrecipients, insuring that the agency is in compliance based on the grant agreement. The Rockdale County Finance Department will assist departments in monitoring subrecipients.

4.4.2 Desk Evaluations

Grant evaluations may be conducted by the grantor through the desk of Rockdale County staff or on-site where the program is administered. Desk evaluations are generally conducted for the purpose of saving time, with a site visit to follow the initial assessment of data and documentation if it is determined that a site visit is needed to finalize the evaluation.

The steps in a desk evaluation typically include: 1) Researching any subrecipients, the program and the project, 2) Collecting information and documentation, 3) Analyzing documentation, and 4) Reporting the results and notifying the County and other appropriate agents.

4.4.3 Site Visits

Site visits are particularly appropriate for complex or troublesome projects, but can also be utilized as a form of randomly assessing grant programs, to insure that proper systems are in place to meet requirements of the grant.

4.4.4 Evaluation Documents

The following documents are typically requested for a grant evaluation or site visit:

- Grant program files
- Governing regulations

- Financial and progress reports and supporting information
- Audits
- Grant staff and subrecipients' policies and procedures

4.5 Technical Assistance

The Finance Department will provide technical assistance for any related compliance matter, provided that reasonable notice is given requesting such assistance.

4.6 Occurrences that Call for Grant Staff to Notify Finance Immediately

4.6.1 Key Personnel Changes

The Finance Department shall be notified as quickly as possible by the department or agency upon the resignation, termination, or retirement of any grants liaison or other key grant program staff member to insure that proper retention of information and continuous grants management occurs during the transition period.

4.6.2 Notice of Audit, Monitoring visit or Review

The Finance Department shall immediately be notified upon receipt of a notice by a County department of a site or monitoring visit to be performed by the grantor funding agency. Finance staff may assist in the preparation of grantor site visits, reviews, or audits.

4.6.3 Grant Misconduct

Waste, fraud, abuse, misconduct or any other serious deviation from acceptable grant practices when proposing, carrying out, or reporting activities or results that involve a grant is considered grant misconduct. Any form of grant misconduct or potential misconduct shall be reported to Finance within twenty-four (24) hours. Upon contact, the Finance Department will take a report and then work with department to insure all proper investigative and notification procedures are followed.

5 GENERAL GRANT REGULATIONS

5.1 DUNS Number Requirements

The Federal government requires that all applicants for Federal grants, cooperative agreements, and subawards, with the exception of individuals other than sole proprietors, have a DUNS number to better identify Organizations that are receiving funding under grants and cooperative agreements, and to provide consistent name and address data for electronic grant application systems.

The Data Universal Numbering System (DUNS) number is a unique nine-digit identification number provided by Dun & Bradstreet (D&B). The DUNS Number is site-specific. Therefore, each distinct physical location of an entity (such as branches, divisions, and headquarters) may be assigned a DUNS number. Subawardees may obtain a DUNS by phone or through the internet. Information on how to obtain a DUNS number is provided on-line at:
http://www.whitehouse.gov/sites/default/files/omb/grants/duns_num_guide.pdf

5.2 Debarment and Suspension

Rockdale County Government and its subrecipients shall not award grant assistance to

applicants that are debarred or suspended, or otherwise excluded from or ineligible for participation in Federal assistance programs.

County departments and subrecipients are to insure to the best of their knowledge and belief that prior to extending a subaward, the potential subaward agency or its principals are not presently debarred, suspended, proposed for debarment, declared ineligible, or voluntarily excluded by any federal department or agency. At a minimum, the department, County subgrantees, and Finance shall check the Excluded Parties List System (EPLS) at www.epls.gov to insure that the agency itself or principals of the subaward agency are not excluded or disqualified based on the EPLS list.

5.3 Federal Funding Accountability and Transparency Act (FFATA)

All new direct federal, grant awards and contracts in the amount of $25,000.00 or more are subject to FFATA reporting.

Finance has internal controls in place to identify potential FFATA subaward obligations. Finance staff will enter the information through the Federal reporting system for all applicable subaward obligations in the amount of $25,000.00 or more no later than the 20th of each month following the month that the subaward was executed.

5.4 Code of Federal Regulations and Office of Management and Budget Circulars

5.4.1 Uniform Administrative Requirements

a) OMB Circular A-102
This OMB grants guidance is for grants and cooperative agreements with State and Local Governments. This guidance is to serve as administrative guidance to Rockdale County Government, including all County departments, in their capacity as a direct federal grantee unless the grant program guidance states otherwise.

b) 2 CFR Part 215 (formerly OMB Circular A-110)
This OMB grants guidance is for grants and agreements with Institutions of Higher Education, Hospitals, and Other Non-Profit Organizations. This guidance is to serve as administrative guidance to Rockdale County Government's sub-recipients that are higher education, hospital or non-profit agencies, unless the grant program guidance states otherwise.

5.4.2 Cost Principles

2 CFR Part 225 (formerly OMB Circular A-87)
This OMB grants guidance is Cost Principles for State, Local, and Indian Tribal Governments. This guidance is to serve as cost principles guidance for Rockdale County Government, unless the grant program's guidance states otherwise.

5.4.3 Audit Requirements

OMB Circular A-133
This OMB grants guidance is Cost Principles for State, Local, and Indian Tribal Governments. This guidance is to serve as cost principles guidance for Rockdale County Government, unless the grant program's guidance states otherwise.

5.5 Equal Services Provider

Rockdale County is an equal employment and services provider. All grant decisions are based on merit and program need, and not on race, color, citizenship status, national

origin, ancestry, gender, sexual orientation, age, weight, religion, creed, physical or mental disability, marital status, veteran status, political affiliation or any other factor protected by law.

County departments shall also adhere to National Policy Requirements affecting grants. Samples of these policies are named below. It is also the responsibility of County departments to ensure that subgrantees adhere to these applicable policies.

5.5.1 Title VI

Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d, et seq. and its implementing regulations provide that no person shall be subjected to discrimination on the basis of race, color, or national origin under any program or activity that receives federal financial assistance. In most cases, when a recipient receives Federal financial assistance for a particular program or activity, all operations of the recipient are covered by Title VI, not just the part of the program that uses the Federal assistance.

5.5.2 Limited English Proficiency (LEP)

Language for LEP individuals can be a barrier to accessing important benefits or services, understanding and exercising important rights, complying with applicable responsibilities, or understanding other information provided by federally funded programs and activities. Title VI and Title VI regulations require that recipients take reasonable steps to ensure meaningful access to the information, programs, and services they provide.

5.5.3 Americans with Disabilities Act (ADA)

In the broadest sense, it requires that state and local governments be accessible to people with disabilities. Additional information regarding statute and regulations can be found at http://www.ada.gov/ .

5.5.4 Other National Policies - Miscellaneous

Age Discrimination Act, Section 504 of the Rehabilitation Act, Fair Labor Standards Act, Davis-Bacon Act, Contract Work Hours and Safety Standards Act, Anti-Kickback (Copeland) Act, Lobbying Restrictions, Debarment and Suspension, Freedom of Information Act, Drug-Free Workplace Act, and more.

The following *generally relate to construction grants:*
National Environmental Policy Act, Federal Water Pollution Control Act, Clean Air Act, National Historic Preservation Act, Davis-Bacon Act, Contract Work Hours and Safety Standards Act, and more.

6 GRANT RELATED FORMS

Rockdale County Board of Commissioners provides certain grant-related forms to be used by County staff when routing grant awards for signature, executing subawards/subcontracts, documenting grant staff time, etc.

Forms referred to are listed below and are provided on the Rockdale County Intranet under the Finance Department's webpage entitled Grant Resource Forms.

i. Budget Summary Form
ii. Special Terms and Conditions Certification Form
iii. Grant Funded Employee Time Certification Form
iv. Route Slip for Contracts, Agreements and MOU's
v. Agenda Item Summary Form

7 APPENDICES

7.1 GLOSSARY

Abstract: An overview and summary statement provided by the subrecipient describing a grant's purpose, client base, goals and objectives. Typically an abstract is limited to one page.

Activities: A logic model component that describes what a program does with the inputs to fulfill its mission. Activities include the strategies, techniques, and types of treatment that comprise a program's service and methodology.

Award: Financial assistance that provide support or stimulation to accomplish a public purpose. Awards include grants and other agreements in the form of money or property in lieu of money, by the grantor to an eligible recipient. The term does not include technical assistance, which provides services instead of money; other assistance in the form of loans, loan guarantees, interest subsidies, or insurance; direct payments of any kind to individuals; and, contracts which are required to be entered into and administered under procurement laws and regulations.

Cash Match: Includes actual cash spent by the subrecipient for project-related costs. Accounting records should be verifiable and trace back to source documentation.

Contracts: Written agreements entered into by the awarding agency, recipients or subrecipients, and commercial (profit-making) and non-profit organizations. With the exception of a few justified sole source situations, contracts are awarded via competitive processes to procure a good or service.

DUNS Number: A number issued by Dun & Bradstreet that identifies individual companies world-wide. It may also distinguish a parent agency from its branch agencies.

Equipment: Tangible non-expendable personal property having an acquisition cost of $5,000 or more per unit. A subrecipient may use its own definition of equipment provided that such definition would at least include all equipment defined above.

Grant: Agreement of financial assistance from an agency to a recipient to carry out a public purpose of support or stimulation whenever 1) the principal purpose of the relationship is the transfer of money, property, services, or anything of value to the recipient in order to accomplish a public purpose of support or stimulation authorized by statute, and 2) no substantial involvement is anticipated between the grantor agency and the recipient during performance of the contemplated activity.

Grant staff: Any Rockdale County staff member, or other person, who is acting on behalf of a Rockdale County Government grant.

Grantor: Primary awarding agency, i.e. federal or state government.

Grantee: The direct recipient of a grant award who is legally bound by the grantor's award or contract.

In-kind Match: In-kind match does not involve cash. 'In-kind' is the value of something received or provided, which is beneficial to the program, but for which no cash exchanges hands. In-kind contributions must be verifiable from grantee records, necessary and reasonable, allowable under cost principles, and not included as a contribution under any other federal award

Inputs: A logic model component that includes resources dedicated to or consumed by a program such as money, staff and staff time, facilities, equipment and supplies.

Logic Model: A logical description of how the project theoretically works to benefit the target group. The narrative description of the applicant's project must tie purposes, inputs, activities, outputs, and outcomes together in a logical fashion.

Match: The subrecipient share of the project cost. Match is restricted to the same use of funds as allowed for the Federal funds. Match must be directly related to the project goals and objectives and must be documented in the same manner as grant funded activities. See cash match and in-kind match.

Non-profit Organization: The term nonprofit organization refers to those legally constituted, nongovernmental entities, incorporated under state law as charitable or not-for-profit corporations that have been set up to serve some public purpose and are tax- exempt according to the IRS.

Obligation: A legal liability to pay under a grant, subgrant, and/or contract an agreed upon sum for services or goods incurred during the grant term.

Outcomes: A logic model component that describes the benefits resulting for the participants from the program activities. Outcomes should describe some change in the participant's condition. The key is to show what differences a project is expected to make or what value it is expected to add to the participant's well-being. Outcomes establish the benefits of the funding in measurable terms. They describe the results of the services being provided.

Outputs: A logic model component that describes the direct products of program activities and usually are measured in terms of the volume of work accomplished such as the number of classes taught, counseling sessions held, people served, etc.

Pass-through entity: A non-grantor entity that provides an award to a subrecipient to carry out a grant program.

Personally Identifying: Identifying information for or about an individual including information likely to disclose the location of a victim of domestic violence, dating violence, sexual assault, or stalking, includes:

a) a first and last name
b) a home or other physical address;

c) contact information (including a postal, e-mail or Internet protocol address, or telephone or facsimile number)
d) a social security number;
e) any other information, including date of birth, racial or ethnic background, or religious affiliation, that, in combination with what is listed above would serve to identify any individual.

Program Income: Gross income earned by the recipient during the funding period as a direct result of the award.

Subrecipient: The legal entity to which a subaward is made and which is accountable to the recipient for the use of the funds provided. Subrecipient and subawardee are interchangeable terms.

Subaward: An award of financial assistance, generally a monetary award, made as a result of a Federal award to a grant recipient or contractor to a sub-recipient or sub-contractor respectively.

Subgrant: An award of financial assistance made under a grant by a grantee to an eligible subgrantee. The term includes financial assistance when provided by contractual legal agreement, but does not include procurement purchases, nor does it include any form of assistance which is excluded from the definition of grant in this part.

Subgrantee: means the legal entity to which a subgrant is awarded and that is accountable to the grantee for the use of the funds provided.

8 BOARD OF COMMISSIONERS APPROVAL

Approved this _____ day of September 2016.

ROCKDALE COUNTY, GEORGIA
BOARD OF COMMISSIONERS

By: _____
Richard Oden, Chairman and CEO

By: _____
Osborn Nesbitt, Sr., Commissioner

By: _____
Doreen Williams, Commissioner

Attest:
By: _____
Jennifer Rutledge, County Clerk