

Subject: Alternative Funds/Grants
Date: August 26, 2020
Pages: 1 of 13
Replaces Policy Dated: September 7, 2011

A. PURPOSE:

To develop standards for applying, approving and implementing projects using alternative funds, such as grants.

B. STATEMENT OF POLICY:

This policy is to provide guiding principles developed to address long term-goals in the stewardship of funds and adherence to attendant obligations.

This policy serves as the framework for Pinal County Departments/Divisions/Elected Officials/Special Districts ("Departments") to follow when applying for alternative funding, when negotiating the terms and conditions of attendant agreements/contracts and when executing the terms and conditions of such agreements/contracts to ensure strategic goals are met.

C. AUTHORITY:

The County adheres to all approved policies of the Pinal County Board of Supervisors as it relates to alternate funding and grant awards. All County policies may be found at: <https://www.pinalCountyaz.gov/HR/Pages/PoliciesProceduresRules.aspx>.

Similarly, the County adheres to the 2 CFR 200 Uniform Grant Guidance for all federal funding awards which may be found at: <https://gov.ecfr.io/cgi-bin/text-idx?SID=a2cf3e82431f9b3cac94ced0d1281b4e&mc=true&node=pt2.1.200&rgn=div5; 2 C.F.R. §§ 200.0—200.521>.

The Office of Management and Budget's (OMB) Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (commonly called "Uniform Guidance") was officially implemented in December 2014 by the Council on Financial Assistance Reform. The Uniform Guidance, a government-wide framework for grants management, is an authoritative set of rules and requirements for Federal awards that synthesize and supersede guidance from earlier OMB circulars.

The Uniform Grant Guidance aims to reduce the administrative burden on award recipients and guard against the waste and misuse of Federal funds by:

- a) Removing previous guidance that is conflicting and establishing standard language;
- b) Directing the focus of audits on areas that have been identified as at-risk for waste, fraud and abuse;
- c) Laying the groundwork for Federal agencies to standardize the processing of data; and
- d) Clarifying and updating cost reporting guidelines for award recipients.

D. APPLICABILITY:

This policy applies to any County department or office seeking to apply for and utilize alternative funds, including grants. This policy is not intended to discourage departments from seeking alternative funding as a means to support various programs and services. Rather, it is intended to provide consistent guidelines for alternative funding administration to ensure compliance. Alternative funds are used to enhance the County's ability to serve its residents.

The following will ensure the County is managing alternative funds in compliance with approved policies:

- a) Anyone seeking alternative funding must seek pre-approval through a workflow process on the Intranet under the Finance and Grants page.
- b) The Board of Supervisors must accept all applications for alternative funding prior to submission.
- c) The Board of Supervisors must formally accept all alternative funding awards which may include a funding agreement prior to any funds being expended.
- d) All alternative funds must be part of the approved County budget or included in the County budget via an amendment approved by the Board of Supervisors.
- e) Departments will seek alternative funds that align with their own strategic goals, and/or those of the County.

Alternative Funding refers to all funding from sources both existing and future such as grants, sponsorships, forfeitures, public/private partnerships or donations. Other funding such as charges for services and fees, fines, taxation, HURF (Highway User Revenue Fund), and permits and licenses are not considered alternative funding.

A grant is an award of financial assistance for which departments have made application to a public or private entity and is subject to requirements imposed by the awarding agency. These requirements include, but may not be limited to, implementing an agreed upon program, being accountable for the use of those funds to accomplish said program, and providing cash or in-kind matching funds or other contribution of County resources.

E. EXEMPTION:

Under special circumstances, the County Manager has the ability to exempt a department from any or all requirements listed in this policy. Each exemption is considered on a case by case basis and is for a single funding request and not intended to be applied to all requests under a department. Such exemption may include a retroactive approval to submit based upon a shortened submission period. Departments that desire this exemption must contact the County Manager's Office. The County Manager will provide written notice to the County Grants Administrator of those exemptions.

F. FINANCIAL REQUIREMENTS:

- a) Departments will use the County financial system to track, monitor and report all revenue and expenditure financial activity using alternative funds.
- b) Departments will provide and respond to requests for information from the Finance Department in a timely manner in order to complete the annual Schedule of Expenditures of Federal Awards.
- c) Departments will comply with federal, state, and local grant policies and regulations including but not limited to agency and program specific requirements, 2 CFR 200, and associated federal grant policies listed on <https://www.grants.gov/web/grants/learn-grants/grant-policies.html>.
- d) In-kind and match will be tracked under a separate sub ledger.

G. RECORDS RETENTION:

Records pertaining to alternate funding shall be retained in accordance with the Secretary of State Arizona State Library, Archives, and Public Records retention schedules, the Pinal County records retention schedule, and as required under the specific funding agency whichever is the longest. In general federal awards should be retained a minimum of three years after the submission of the final report.

The County will use OnBase as the primary records retention holder, however additional project files shall be retained by the department under which the project took place.

Files required to be retained in OnBase include but may not be limited to:

- a) Notice of funding availability
- b) Final application with supporting documentation
- c) Award letter or denial
- d) Executed agreement
- e) Board of Supervisor action – these items will typically be provided to OnBase through the Clerk of the Board's Office under the agenda and minutes.
- f) Amendments to the agreement
- g) Quarterly reports
- h) Financials including invoices, reimbursements, cost center set up request form
- i) Closeout documentation and final report

H. POLICY UPDATES:

This Policy shall be reviewed every three years and updated as changes are needed.

I. PROCEDURES:

1. PRE-APPROVAL:

A pre-approval process is required in order to ensure compliance with County policies and regulations specifically relating to the hiring of personnel, travel, ensuring costs are applicable and allocable, and the identification of local match or other financial contributions that may be burdensome to the County.

Some grant programs are considered allotments to the County and are provided by a funder based upon our population status. Some of these allotments may not require documentation on how the funds will be spent, thus a formal application is not required. However, in the situation where an application is required, this pre-approval process is also required.

To obtain pre-approval, the departments shall submit a request through a workflow process on the Intranet under the Finance and Grants page.

The pre-approval request shall include the following items:

- a) Department seeking request
- b) Who will be submitting the request
- c) Who will be managing the project and reporting
- d) Grant type
- e) Funding agency
- f) Project name
- g) Project description
- h) The amount being requested
- i) Matching funds required
- j) Budget specific items including: personnel, overtime, technology, travel, equipment, capital assets, facilities, fleet
- k) Anticipated impacts to the budget
- l) Anticipated award date
- m) Project dates (beginning – end)
- n) The Notice of Funding Availability

The following workflow will commence upon submission:

- a) Department Director – approval required
- b) Finance Grant Accountant – will receive a notification only

- c) Human Resources – when personnel is being hired with the grant
- d) Information Technology – to ensure compatibility and supportability of the County technology infrastructure. This applies to hardware, software and communications technologies including data, voice, video, image radio telemetry and facsimile purchases under the provisions of the County's Procurement Code.
- e) Fleet – to ensure compatibility and supportability of all vehicles and equipment serviced by Fleet Services.
- f) Facilities – to ensure compatibility and supportability with County facilities infrastructure, including construction/remodeling or repair of facilities.
- g) Finance – to determine applicability of procurement; and to ensure availability of local match.
- h) Office of Management and Budget –
 - a. to determine impacts on the budget and a potential amendment;
 - b. to ensure the project is not supplanting; and
 - c. to ensure availability of local match.
- i) County Attorney's Office – to ensure compliance with legal obligations.
- j) County Management – to ensure alignment to strategic goals.

Regardless of the type of funding program, notification to the Board of Supervisors is required in order to maintain a position of transparency and information sharing. The departments shall submit to Novus an item for consent on the next Board of Supervisors agenda. This item should include a brief description of the project, the amount being requested, and the anticipated award date. If a formal resolution or approval is required by the funder, this should also be placed on the agenda. A Board of Supervisors request form can be found at intranet.pinal.gov/grants.

If Board of Supervisors approval to accept an award is required as part of the application, then the Board of Supervisors agenda item may include language to accept any award granted, provided that all terms of the funding agreement are in compliance with this guideline and the information presented to the Board of Supervisors is consistent with the original award.

In the event the grant submission period is prior to the next board meeting, a retroactive approval may be submitted to the agenda with County Manager approval. This process may not receive a pre-approval to accept an award through a resolution. It is not the intention of the board to reject grant applications, however the board reserves the right to request a grant be rescinded, understanding this may be looked upon unfavorably by the funding agency.

2. AWARD ACCEPTANCE:

A grant award must be placed on the Board of Supervisor's agenda for acceptance of the grant award including a funding agreement. Regardless of the existence of a funding agreement, the award must be accepted by the Board of Supervisors. However, seeking pre-approval prior to submitting a grant accompanied by a resolution which states the Chairman, County Manager, or the Finance Director may sign and execute an agreement upon award, may reduce the amount of time to accept the award.

Funding agreements typically include compliance terms. It is important these terms are reviewed and understood prior to taking them before the Board of Supervisors. See Appendix A regarding common compliance terms under federal awards.

The Office of Management and Budget will request a budget amendment based upon the grant award. Once the budget is amended a cost center must be created in the financial system. A cost center request form and an executed funding agreement must be submitted to OnBase and identified as a grant. OnBase will place grant related documents in a folder created as a result of the initial pre-approval request. The funding agreement should include: the award amount, effective dates of the agreement, distinction between reimbursement or advance funding, the CFDA number (if applicable), reporting criteria, and a description of the alternative funding and project. The provided information will be used to establish a cost center and financial controls within the County financial system and will not be changed or modified without supporting

documentation from the Grantor.

In some cases, the final award may differ from the originally approved amount. In these instances, the departments must place acceptance of the new award amount on the agenda of a Board of Supervisors meeting. This may also require an additional budget amendment.

Departments may receive alternative funding from the same source for the continuation of a program. In order to accept ongoing alternative funding, departments must obtain approval from the Board of Supervisors on an annual basis. After these alternative funds have been reviewed and accepted by the Board of Supervisors, subsequent funds for that fiscal year from the same funder with like provisions do not require the Board's review and acceptance. However, budget amendments may still be required and submitted to the Board of Supervisors accordingly.

3. SIGNATURE COMPLIANCE:

Applications and reports require specific signatures in order to submit, change, or report on a grant award. The appropriate signatures are essential to ensure proper protocols, transparency, and compliance. Many grants require signatures either electronically or on paper. The following will serve as the appropriate signatures for grant applications:

- a) The Chief Elected Official is the Chairman of the Board of Supervisors.
- b) The Chief Executive Officer is the County Manager.
- c) The Financial Certifying Officer is the Finance Director who shall sign all financial documents or reports.
- d) The Legal Representative is the Deputy County Attorney.
- e) Department Directors may sign non-legally binding documents when authorized to do so by the Board of Supervisors, County Manager, and grant program only after the Chairman of the Board of Supervisors has authorized them as the designee.
- f) The County's Grant Administrator is the authorized organizational representative (AOR) within the Grants.gov system and may sign electronic documents when authorized to do so by the persons listed above.

Federal grants will require the completion and submission of the SF-424 form. There are three types of submissions under this form: pre-application, application, and change/corrected application. When submitting an application, this document will require the signature of the Authorized Representative. If this form can be signed and uploaded, the Chief Elected Official is the authorized signature. If an electronic signature is required, the Grants Administrator may sign this document.

Seeking pre-approval prior to submitting a grant pursuant to a County resolution authorizing the Chairman, County Manager, or the Finance Director to sign and execute an agreement upon award, may also include authorization to sign applicable documents exclusive of funding agreements.

4. ONLINE SYSTEMS FOR FEDERAL GRANT APPLICATIONS:

The entity applying for federal funds must be registered in SAM.gov and most federal agencies require applications be submitted via Grants.gov. The County's Grants Administrator serves as the Electronic Point of Contact for these systems. There is only one SAM.gov account and no department should create another. Likewise, no department should create a new account in Grants.gov without pre-authorization from the Grants Administrator.

5. RESPONSIBILITIES:

Due to the decentralized nature of the County's grant program, each department has: 1) a designated financial manager who processes invoices, purchase orders, and maintains the budget; 2) a grant writer(s) who writes and submits the requests; 3) a program administrator (s) who manage the project after award; and 4) a director who oversees and approves all grant requests. Each department will:

- a) Use the County financial system to track, monitor and report all revenue and expenditure financial activity using alternative funds.
- b) Monitor expenditures and reimbursement claims quarterly, at a minimum, or more frequently as appropriate, unless there are no reimbursement expenses or reports required.
- c) Review, reconcile and certify the monthly Fund Balance Report through E1. Any discrepancies are to be reported to the Finance Department within two (2) weeks of receiving the Fund Balance Report. A written response must be received by the Finance Department to report any discrepancies.
- d) Reconcile and close expired Alternative Fund contracts on the County financial system within 90 days of the grant end date (as entered on the County financial system).
- e) Communicate with the Budget Office and the Finance Department regarding active and closed Alternative Fund projects with a negative balance (non-reimbursable expense). They must develop a plan of action to resolve the deficit. For departments, the plan should only consider utilizing General Funds as a last option.
- f) Ensure that Alternative Fund expenditures do not exceed award.
- g) Comply with all reporting requirements including final reporting and closeout documentation as defined by the funding source and County procedures and guidelines.
- h) Comply with all record retention requirements as defined by the funding source and applicable retention schedule(s).
- i) Track and document any equipment purchased using alternative funds.
- j) Verify that all sub-recipients/contractors have not been suspended or debarred on the www.sam.gov website. All awards to sub recipients must be approved by the Board of Supervisors through the use of an agreement or a similar document.
- k) Provide notification to any employee hired or paid partially or fully with grant funds, that upon expiration of such grant funds, absent securing additional funds, the position will cease to exist and employment may be terminated. Notification will be made via the Statement of Understanding form that can be found on the Pinal County Human Resources website.
- l) All final reports and documentation will be submitted to the Finance Department to ensure the alternative funds are accurately closed on the financial system within 90 days after the end of the funding agreement period. All unreimbursed costs must be identified and a plan of action defined to ensure an alternate funding source is identified and the grant fund is effectively closed within the 90-day timeframe. All unresolved grant balances/ (deficits) after the 90-day timeframe will be reported to the County Manager by the department managing the grant.

The Office of Management and Budget is responsible for presenting budget amendments for grant awards to the Board of Supervisors, and assisting departments with budget appropriation adjustments to correct deficits.

The ERP Team is responsible for setting up cost centers in the financial system based upon submitted requests by each department's financial manager.

The OnBase Team is responsible for ensuring all grant applicable documentation is copied into a designated grant file.

It is the role of the County Finance Department's Grants Administrator to ensure compliance with grant requirements and provide grant related services to the departments upon request to include: grant research, grant writing, project planning, project administration, project management, application review, and reporting.

The County Finance Department's Grant Accountant is responsible for collecting financial information and preparing the Schedule of Expenditures of Federal Awards ("SEFA") each year. Information on what

documentation is required and the procedures can be found on the Internet under the Finance and Grants page.

The Finance Department roles include:

- a) Provide general and technical oversight and consulting of all alternative funds.
- b) Establish an appropriate accounting structure on the County financial system when all supporting documentation is provided.
- c) Communicate with the department responsible for the alternative funds and the Office of Management and Budget regarding fund balance and/or deficit issues.
- d) Issue tags for any capital assets purchased using alternative (grant) funds. Tags are to be affixed on assets by the department.
- e) Complete the procurement process for the purchase of items or services.

<i>Review Date</i>	<i>Brief Description of Revision, if applicable</i>	<i>Board of Supervisor Approval Date/Revision Date</i>
July 2020	Policy replaced.	August 26, 2020

Appendix A

FEDERAL COMPLIANCE TERMS AND APPLICABLE COUNTY POLICIES AND PRACTICES

The existence of grant funds does not exempt County personnel or project staff from conducting project activities in accordance with County policies and procedures which govern fiscal processes, hiring of personnel, employee travel, procurement, etc. Regulations and reporting requirements of the funding agency are in addition to, not replacement for, County policies and procedures. The most restrictive policy/procedure will be used. Refer questions regarding grant term compliance to the appropriate County Department(s) as applicable or to legal counsel when necessary.

The Uniform Guidance in 2 CFR Part 200 is applicable to all federal awards. In most cases, this guidance serves as best practices when dealing with grant funds. Where applicable, a Pinal County Policy and Procedure (“pnp”) is referenced.

Body Armor Policy:

Each department which uses body armor shall have a policy outlining acceptable use of the equipment. A grant award agreement may require the Grant Recipient/Subrecipient’s compliance with specifically referenced federal laws, regulations, policies, and/or programs dealing with body armor specifications—i.e. 34 U.S.C. § 10202(c)(1)(A); see also <https://nij.gov/topics/technology/body-armor/Pages/compliant-ballistic-armor.aspx> and <https://nij.gov/topics/technology/body-armor/pages/safety-initiative.aspx>.

Capital Assets: pnp 8.80

Each department must maintain, track, and manage all capital assets as described in County policy. Federal awards define equipment as an item valued at \$5,000 or more with useful life of one year or more. Supplies are anything not classified under equipment valued at under \$5,000 regardless of the useful life.

Civil Rights Compliance and Nondiscrimination Policy: pnp 3.10, 3.15

Pinal County prohibits unlawful discrimination and/or harassment by any Pinal County employees. A grant award agreement may require the Grant Recipient/Subrecipient’s compliance with specifically referenced federal laws, regulations, policies, and/or programs dealing with civil rights and nondiscrimination practices—i.e. Title VI of the Civil Rights Act of 1964, Title IX of the Education Amendments of 1972 or 28 C.F.R. Parts 38, 42 and 54.

Conflict of Interest: pnp 3.35

The County shall avoid any appearance of a conflict of interest in all matters pertaining to grant awards in compliance with Pinal County policy. Any conflict must be identified in writing to the funding agency. A grant award agreement may require the Grant Recipient/Subrecipient’s compliance with specifically referenced federal laws, regulations, policies, and/or programs dealing with conflicts of interest—i.e. 2 C.F.R. § 200.112.

Cooperative audit resolution:

Pinal County takes the recommendations of the annual audit very seriously. Recommendations are provided to ensure the highest level of accountability. The finance department will work with any applicable departments to rectify or address each audit finding to maintain compliance. Resolutions will typically occur within six months of the recommendation. Where applicable, a compromise may take place in order to address the finding and maintain general operating procedures based on the department’s needs. Any compromise will be discussed with the auditors to ensure an adequate level of compliance. A grant award agreement may require the Grant Recipient/Subrecipient’s compliance with specifically referenced federal laws, regulations, policies, and/or programs dealing with conflicts of interest—i.e. 2 C.F.R. § 200.513.

De Minimis Cost Rate: pnp 9.10 Articles 1—13

Pinal County is not approved by a cognizant agency for an indirect cost rate for reimbursement under federal awards. Therefore, should the County wish to seek indirect cost reimbursement on an application, the County will use the authorized 10% de minimus rate. A grant award agreement may require the Grant

Recipient/Subrecipient's compliance with the 2 C.F.R. §200.414 cost rate requirements.

Employment Eligibility Verification: pnp 1.20

The Human Resources office shall verify eligibility of employment through e-verify prior to an offer of employment. A grant award agreement may require the Grant Recipient/Subrecipient's compliance with specifically referenced federal laws, regulations, policies, and/or programs dealing with employment eligibility verification—i.e. 8 U.S.C. § 1324a(a)(1)—(2) and the E-Verify system, available at www.e-verify.gov.

Equal Employment Opportunities: pnp 3.10

Pinal County provides equal employment opportunity for all applicants and employees. The County does not unlawfully discriminate on the basis of race, color, religion, gender, national origin, marital status, age, physical or mental disability, medical condition, or veteran status. A grant award agreement may require the Grant Recipient/Subrecipient's compliance with specifically referenced federal laws, regulations, policies, and/or programs—i.e. 28 C.F.R. Part 42, Subpart E.

Expenditure Approval: pnp 8.30, 9.10 Articles 1—13

Some expenditures up to \$250,000 may be authorized by the County Manager or Finance Department Director, as authorized by the Board of Supervisors. Expenditures in excess must be authorized by the Board of Supervisors. A grant award agreement may require the Grant Recipient/Subrecipient's compliance with specifically referenced federal laws, regulations, policies, and/or programs dealing with procurement processes—i.e. see <https://ojp.gov/funding/Explore/NoncompetitiveProcurement.htm>.

Financial management: pnp 8.05—8.91

The management of federal awards must include a financial management system which can separate federal awards from other funding sources and identify a project based upon its Catalogue of Federal Assistance (“CFDA”) number and the Federal Award Identification Number (“FAIN”). This will enable the Finance office to complete an accurate Schedule of Expenditures of Federal Awards (“SEFA”) each year. The system must also identify the awarding agency and indicate if the award was a pass through from another agency. Similarly, if the County will serve as the pass through agency. All federal awards must comply with the applicability of costs as identified within the cost principles Subpart E 2 CFR 200. Each award will include data standards and requirements which shall be tracked by the departments in order to submit proper reporting.

A grant award agreement may require the Grant Recipient/Subrecipient's compliance with specifically referenced federal laws, regulations, policies, and/or programs dealing with fiscal management practices—i.e. 2 C.F.R. §§ 200.302 & 200.305, the U.S. D.O.J. Grants Financial Guide, available at <https://ojp.gov/financialguide/DOJ/index.htm>; see also <https://ojp.gov/funding/Explore/FY20AppropriationsRestrictions.htm>.

Financial reporting: pnp 8.90

Federal awards require the submission of a Federal Financial Report (“SF-425”) form. This form is typically submitted electronically thus requires an electronic signature. However in some instances, this form may be printed and signed. The SF-425 requires the signature of the certifying officer. The appropriate certifying officer is the Finance Director, whom shall electronically sign each submission. The Finance Manager for each department shall complete the form and forward to the Finance Director for signature prior to submission. A grant award agreement may require the Grant Recipient/Subrecipient's compliance with specifically referenced federal laws, regulations, policies, and/or programs dealing with financial reporting practices—i.e. 2 C.F.R. § 200.327.

Indirect costs:

See De Minimis Cost Rate section above. See also 2 C.F.R. § 200.414.

Internal controls: pnp 9.10—9.30

Internal controls affect all policies and procedures to be good stewards of federal funds and protection of personally identifiable information. The finance department has established internal controls pertaining to

the flow of information and steps to process all financial documentation including but not limited to grants. These internal controls provide for the effectiveness and efficiency of operations, reliability of reporting, and compliance with applicable rules, laws and regulations. The primary emphasis is on common control activities which include the segregation of functional responsibilities to create a system of checks and balances; a system of authorization and record procedures adequate to provide reasonable accounting control over assets, liabilities, revenues, and expenditures; and the development of policies and procedures for prescribing and documenting processes. Additional controls include the payment of services, procurement, and the processing of invoices and payments. Each department's finance manager should be aware of these procedures. A grant award agreement may require the Grant Recipient/Subrecipient's compliance with specifically referenced federal laws, regulations, policies, and/or programs dealing with internal controls—i.e. 2 C.F.R. § 200.303.

Lobbying Disclosure:

Pinal County affirms no federal appropriated funds have been paid or will be paid, by or on behalf of it, to any person for influencing or attempting to influence an officer or employee of any agency, a member of Congress, an officer or employee of Congress, or an employee of a member of congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into any cooperative agreement and the extension, continuation, renewal, amendment, or modification of any federal contract, grant, loan, or cooperative agreement;

If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a member of congress, an officer or employee of Congress, or an employee of a member of congress in connection with Pinal County's Federal contract, grant, loan, or cooperative agreement, the County shall certify and disclose this on the Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions. A grant award agreement may require the Grant Recipient/Subrecipient's compliance with specifically referenced federal laws, regulations, policies, and/or programs dealing with lobbying restrictions—i.e. 18 U.S.C. § 1913 and 31 U.S.C. § 1352.

Mandatory disclosures: pnp 1.05

The County is required to disclose any violations of fraud, bribery, and gratuities relating to federal grant awards. The County shall report in writing to the direct funding agency contact any violations within 30 days of becoming aware of the violation. A grant award agreement may require the Grant Recipient/Subrecipient's compliance with specifically referenced federal laws, regulations, policies, and/or programs dealing with mandatory disclosures of fraud, bribery and gratuities—i.e. 2 C.F.R. § 200.113.

National Environmental Policy:

Pinal County shall comply with all applicable NEPA requirements when undergoing a project with the use of federal funds that may have an adverse effect on the environment.

Payment:

Each department is responsible for seeking reimbursement from the funding agency through the approved reporting methods and processing the request for payment of invoices through finance. The finance department has policies and procedures in place to minimize the time between disbursing payments and the department seeking reimbursements from the funding agency. A grant award agreement may require the Grant Recipient/Subrecipient's compliance with specifically referenced federal laws, regulations, policies, and/or programs dealing with payment/disbursement on a reimbursement basis—i.e. 2 C.F.R. § 200.305.

Performance goals:

The Federal awarding agency will include in the Federal award an indication of the timing and scope of expected performance by the non-Federal entity as related to the outcomes intended to be achieved by the program. In some instances (e.g., discretionary research awards), this may be limited to the requirement to submit technical performance reports (to be evaluated in accordance with Federal awarding agency policy). Where appropriate, the Federal award may include specific performance goals, indicators, milestones, or expected outcomes (such as outputs, or services performed or public impacts of any of these) with an

expected timeline for accomplishment. Reporting requirements must be clearly articulated such that, where appropriate, performance during the execution of the Federal award has a standard against which the Counties performance can be measured. The Federal awarding agency may include program-specific requirements, as applicable. These requirements should be aligned with agency strategic goals, strategic objectives or performance goals that are relevant to the program. A grant award agreement may require the Grant Recipient/Subrecipient's compliance with specifically referenced federal laws, regulations, policies, and/or programs dealing with collecting and reporting data evincing performance and effectiveness under the grant award—i.e. 2 C.F.R. § 200.210; see also DOJ Grants Financial Guide – Post award Requirements – Section 3.10.

Personally Identifiable Information:

A grant award agreement may require the Grant Recipient/Subrecipient's compliance with specifically referenced federal laws, regulations, policies, and/or programs dealing with protection and disclosure of personal information—i.e. 2 C.F.R. § 200.79, Office of Management and Budget ["OMB"] Circular A-130 and OMB M-17-12.

Personnel Compensation: pnp 3.10

In general, grant funds are reimbursable for staff hired specifically to administer a project or program receiving grant funds. Staff already paid through the County's budget may not seek reimbursement for staff time unless specifically determined to be allowable by the funding agency. Any grant staff hired must comply with Human Resource policies and Equal Employment Opportunities. Staff seeking reimbursement must document 100% of their time relating to the grant and provide any cost sharing or match requirements as applicable. A grant award agreement may require the Grant Recipient/Subrecipient's compliance with specifically referenced federal laws, regulations, policies, and/or programs dealing with staff compensation—i.e. 2 C.F.R. § 200.430.

Prior Approvals and Use Restrictions:

In most cases, the notice of funding availability and the cost principles identified in 2 CFR 200 identify the eligible costs associated with a grant program. If there is a question regarding applicable costs, the County shall receive written approval from the granting agency prior to inclusion on the grant budget request. Once approved, the grant budget will serve as the guideline for eligible expenditures. Deviations from the budget must be pre-approved by the funding agency to include line item transfers and new expenditure items. A grant award agreement may require the Grant Recipient/Subrecipient's compliance with specifically referenced federal laws, regulations, policies, and/or programs dealing with cost eligibility—i.e. 2 C.F.R. § 200.407.

Procurement: pnp 9.10—9.30

All grant programs shall comply with Pinal County policies pertaining to the procurement of services and products to encourage free and open competition. Each notice of procurement shall include the following statement, "An Equal Opportunity Employer, DBE/MBE/WBE Encouraged". This statement shall ensure that efforts are made to recruit minority, disabled and woman owned businesses for County projects. Furthermore, the County's policy makes a distinction between the methods of procurement which includes thresholds and types of procurement procedures. The County will use the cost principles provided in 2 CFR 200 Subpart E to determine if costs are allowable, reasonable, and allocable. A grant award agreement may require the Grant Recipient/Subrecipient's compliance with specifically referenced federal laws, regulations, policies, and/or programs dealing with Procurement processes—i.e. 2 C.F.R. §§ 200.317—200.326.

Progress reporting:

Each application submitted should have identified thoughtful performance measures and deliverables. Often, these are provided by the funding agency under the grant program. The reporting periods are predetermined dates established during the life of the grant agreement. It is the responsibility of the department to submit timely reports that address all performance measures. Annual reports are typically due 90 calendar days after the reporting period and quarterly reports are due 30 calendar days after the reporting period. A final report is due 90 calendar days after the end of the project. Some agencies have established websites to enter data and some may have standard reporting forms. This may vary with each

agency. Reports may include, but are not limited to, the reporting of actual accomplishments to the objectives, and the reasons why goals are not met. A grant award agreement may require the Grant Recipient/Subrecipient's compliance with specifically referenced federal laws, regulations, policies, and/or programs dealing with collecting and reporting data/information evincing progress under the grant award—i.e. 2 C.F.R. § 200.328; see also DOJ Grants Financial Guide – Post award Requirements.

Risk Assessments:

Pinal County requires the highest level of compliance and accountability for all awards. In order to reduce the likelihood of waste, fraud, and abuse, the County has:

- a) Established financial policies which include internal controls and oversight. Each department is required to follow additional oversight and procedures to ensure requests submitted to the funding agency are allocable, allowable, and reasonable;
- b) Implemented procurement policies in order to ensure the procurement process is a fair an open competition; and
- c) Approved grant policies in order to monitor pre and post award projects to ensure compliance including those relating to outside contractors and partners/subrecipients.

Any evidence of waste, fraud, and abuse of alternate funding will result in an immediate correction of internal deficiencies, written expectations for partners and contractors to comply and correct the deficiencies, and the potential for a determination of denial or cancellation of an agreement. The County reserves the right to report these deficiencies to the Federal Awardee Performance and Integrity Information System (“FAPISS”) and the system for debarment through SAM.gov which may result in denial of future awards or agreement for federal and County projects. A grant award agreement may require the Grant Recipient/Subrecipient's compliance with specifically referenced federal laws, regulations, policies, and/or programs dealing with recipient/subrecipient risk assessment(s)—i.e. 2 C.F.R. §§ 200.20, 200.205 & 200.212.

Subrecipients and Sub awards:

Should the County have subrecipients under a grant award, the County shall execute a subrecipient agreement which outlines, at a minimum, the program requirements, the project scope, reporting and compliance factors, and the amount of funding being provided. Each funding program which allows for subrecipient agreements will provide specific guidance on what should be included in the agreement. In addition to the agreement, prior to award, the agency shall be verified on SAM.gov to ensure they are not suspended or debarred from working on a federal project. All awards to sub recipients must be approved by the Board of Supervisors through the use of an agreement or a similar document.

All federal sub awards/sub grants must have specific federal authorization. For more information see <https://ojp.gov/funding/Explore/SubawardAuthorization.htm>. A recipient may be required to monitor sub awards in accordance with applicable statutes, regulations and award conditions.

In some instances the County may be a subrecipient, for example under an award granted to the State. The applying/awarded County Department or Office should clearly identify its role/position in the grant award structure in order to appreciate and perform the applicable terms of the award agreement.

A grant award agreement may require the Grant Recipient/Subrecipient's compliance with specifically referenced federal laws, regulations, policies, and/or programs dealing with sub award expenditures—i.e. 2 C.F.R. § 200.330; see also <https://ojp.gov/funding/Explore/FFATA.htm>.

Suitability to interact with participating minors:

A grant award agreement may require the Grant Recipient/Subrecipient's compliance with specifically referenced federal laws, regulations, policies, and/or programs dealing with determination of suitability of participating individuals to interact with participating minors when applicable—i.e. see <https://ojp.gov/funding/Explore/Interact-Minors.htm>.

Supplanting vs. Supplementing:

Federal awards may not supplant or take the place of the current appropriation of funds approved by the

County through the budget. This means no grant request shall be submitted to a federal agency for an item or service that is already included in the budget. However, supplementing is acceptable. This means, a federal grant award may increase or add to the project.

System for Award Management (“SAM”):

A grant award agreement may require the Grant Recipient/Subrecipient’s compliance with the System for Award Management and Universal Identifier Requirements, available at <https://www.sam.gov/> and at <https://ojp.gov/funding/Explore/SAM.htm>. See Procedures, Section 4: Online Systems for Federal grant Applications above.

Training Materials:

A grant award agreement may require the Grant Recipient/Subrecipient’s compliance with specifically referenced federal laws, regulations, policies, and/or programs dealing with training and training materials standards—i.e. see <https://ojp.gov/funding/Implement/TrainingPrinciplesForGrantees-Subgrantees.htm>.

Travel: pnp 4.50, 8.50, 9.30

There are certain costs and rates allowable under federal awards. Often awarding agencies will provide the source for accepted rates. Costs may be actuals, per diem, or a combination but must be consistent with supporting documentation. In general, travel expenses must be consistent with the County’s policy. Competing priorities with the funding agency will result in the most restrictive policy being used. Referenced federal laws, regulations, policies, and/or programs dealing with travel expenditures—i.e. 2 C.F.R. § 200.474.

Uniform guidance standards:

Applications submitted should include identified goals and performance measures for the project. Each performance measure should be reviewed and a comparison made between what was proposed and the actual accomplishments. Funders are interested to hear and understand issues that may have arisen from the project. Therefore it is important to understand and identify when goals have not been met, when there was a cost overrun, and any other issues regarding the progress of the project. Maintaining an open line of communication with the funder may provide additional support and insight in methods to correct or identify potential issues. The Grants Administrator may provide assistance establishing performance measures.

Whistleblower Policy:

A whistleblower is someone who reports unlawful acts to the appropriate authorities without the threat of retaliation. Pinal County encourages and enables employees and others to raise serious concerns internally so the County may address and correct inappropriate conduct and actions. It is the responsibility of all County employees and elected officials to report concerns about violations of ethics or suspected violations of law or regulations that govern County operations. A grant award agreement may require the Grant Recipient/Subrecipient’s compliance with specifically referenced federal laws, regulations, policies, and/or programs dealing with reporting of fraud, waste, mismanagement, dangers to health or public, violations of law, etc.—i.e. 41 U.S.C. § 4712.