

<b><u>P.O. 1003 Grants Management</u></b>			
Effective From:	09/24/2022	Effective To:	Current

*C. P.O. 1003 – Grants Management*

1. PURPOSE

- i) To describe the grant process and the responsibilities of the Contracts and Grants Unit (CGU) located within Operational Development. This policy will ensure that the Department complies with Title 2, Code of Federal Regulations (CFR), Part 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards and State/Federal Guidelines.

2. POLICY

- i) The CGU will research, apply for, and manage grants, as delegated by the Superintendent, to support the missions and objectives of the Department.
- ii) In the event a Section has received approval through its chain of command to apply for a grant directly, that Section will coordinate with the CGU to ensure that the application does not conflict with any pending applications or existing grants that are managed by Operational Development.
- iii) The CGU has primary responsibility for a variety of grant-related functions, and works in cooperation with the Office of Management and Finance (OMF) utilizing reports developed and maintained by OMF, and shared with the CGU.

3. DEFINITIONS

- i) Department – for the purposes of this Procedural Order, “Department” refers to the Office of State Police within the Department of Public Safety & Corrections, Public Safety Services.
- ii) Section – organizational unit within the Department.
- iii) Contracts and Grants Unit (CGU) – Operational Development staff members who facilitate all aspects included within the lifecycle of a Departmental grant, from pre-award to post-award phase.
- iv) Contracts/Grants Reviewer – the reviewer assigned to manage the full lifecycle of a specific grant.
- v) Project Director – section representative who is responsible for the oversight of the grant during the award period.
- vi) Award Period – effective dates of a grant, as dictated by the entity that provided the grant award.
- vii) Program Income – gross income earned by a non-federal entity that is directly generated by a supported activity or earned as a result of the federal award during the award period.
- viii) Sole Source Procurement – procurement by noncompetitive proposals through solicitation from only one source.
- ix) Federal Financial Report (SF-425) – quarterly reports required on all federal

funded grant programs that report summary information on actual cumulative expenditures and match from the recipient organization, unliquidated obligations incurred, program income, and indirect costs under the grant.

#### 4. PROCEDURES

- i) Authority
  - a) The Superintendent has the sole authority to accept grant funds for the Department.
  - b) The CGU shall only apply for grants that have been reviewed and approved by the Superintendent.
- ii) Responsibilities of the CGU
  - a) Act as the central coordinating point for the development and submission of grant applications assigned to Operational Development by the Superintendent.
  - b) Manage the full lifecycle of grants assigned to Operational Development by the Superintendent.
  - c) Research and assess potential grant funding opportunities that could support current Departmental goals and objectives.
  - d) Serve as a Departmental liaison to local, state, and federal grant authorities and funding entities.
- iii) Grant Application Process
  - a) All Department employees are encouraged to identify potential funding sources to support the Department's goals and objectives. Employees shall notify their chain of command prior to submitting a grant solicitation to Operational Development for review.
  - b) A packet containing the solicitation (i.e., Notice of Funding Opportunity), a brief narrative of the problem, and the proposed use of the funds should be forwarded to the Commander of Operational Development.
  - c) The CGU will evaluate the grant solicitation for Department eligibility and suitability. The CGU will provide a recommended course of action to the Commander of Operational Development.
  - d) If a grant solicitation is deemed unsuitable, the CGU will provide a detailed response to the applicable employee(s). If a grant solicitation is deemed suitable, the Commander of Operational Development will provide the Superintendent with the grant solicitation packet for review and approval.
- iv) Grant Application Phase
  - a) The CGU is responsible for preparing applications for grant solicitations that have been approved by the Superintendent.
  - b) Sections that have operational interest in the grant application, and/or possess the technical expertise that the application requires, shall provide the CGU with assistance constructing the grant application.
  - c) The designated Contracts/Grants Reviewer will work with the assigned Project Director to ensure that the application is complete and accurate.

- d) When Departmental matching funds are required by a grant, the CGU will obtain a commitment of matching funds from the DPS Chief Administrative Officer before completing the grant application.
- e) When required, the Contracts/Grants Reviewer will use an electronic application to apply for grant funds.
- f) Prior to submitting the application to the Superintendent's Office for approval, the GCU will provide the application to the Chief of Staff's Office for review.
- g) The CGU will coordinate with the Superintendent's Office for signature of the finalized grant application.
- v) Grant Award Phase
  - a) The CGU will notify the Superintendent, Chief of Staff, and the applicable Deputy Superintendent and Section(s) when a grant has been awarded.
  - b) The CGU will provide the appropriate Section(s) Project Director(s) with guidelines and budget details for each grant award to establish and to maintain effective internal controls in accordance with Section 200.303, Internal Controls.
  - c) Program Performance/Progress Reporting shall be completed according to the schedule provided in the grant award (quarter, semi-annual, or annual).
  - d) Program Performance/Progress Reporting shall include the status of the award in terms of equipment purchases, personnel expenditures (salary, overtime, etc.) and other various reporting requirements related to the activities associated with the grant.
  - e) The CGU shall adhere to all Federal Financial Report (FFR) guidelines.
- vi) Determining Allowability of Costs
  - a) Allowability, allocability and reasonableness are defined and determined by the Office of Management and Budget ("OMB"), the sponsor's requirements, and/or state policy. 2 CFR 200, *Cost Principles*, covers this topic by defining what these areas truly constitute. Each financial transaction charged against a sponsored award should be evaluated by the project director and assigned Contracts/Grants reviewer against these three concepts:
    - 1) Allowability. Expenses charged to a sponsored research award must meet two criteria:
      - (i) The costs must be treated consistently through the application of relevant generally-accepted accounting principles appropriate to the circumstances.
      - (ii) The costs must conform to any limitations or exclusions set forth in the sponsored agreement or in Federal Cost Principles.
    - 2) Reasonableness. The cost must be able to withstand public scrutiny, i.e. objective individuals not affiliated with the

department would agree that a cost is appropriate on a sponsored award or as a component in its indirect cost rate.

- 3) **Unallowable Costs on all Federal Awards.** Federal regulations identify specific costs and categories of costs that cannot be charged, directly or indirectly, to federally-sponsored agreements. These costs are never allowed on federally-sponsored awards nor can they be charged to funds that will be treated as a part of indirect cost pools. Unallowable costs are generally defined by the federal government in 2 CFR 200, General Provisions for Selected Items of Cost. Considerations for selected items of cost addresses certain cost categories and defines whether they are allowable as charges on grants.
  - b) Prior to making a purchase or submitting a purchase order for expenditures not specifically deemed allowable in the grant award, the project director shall review the following to ensure the purchase is allowable:
    - 1) 2 CFR 200 Subpart D *Cost Principles*;
    - 2) the Notice of Funding Opportunity program guidance; and
    - 3) the Authorized Equipment List (if applicable).
  - c) The project director shall deny approval to purchase any item or service which is deemed not allowable by any of the three aforementioned sources of award guidance.
  - d) When a project director or contracts/grants reviewer identifies an unallowable expenditure or purchase that has already been completed, they shall initiate steps to remove the expenditure from the award and allocate the expenditure to another funding source.
- vii) **Program Income**
- a) Program Income must be used in accordance with the standards set forth in 2 CFR Program income generated from an award can be used in the following ways:
    - 1) Deducted from total allowable project costs to determine net allowable costs to reduce the federal award,
    - 2) Added to the federal award to increase funds committed to the project, or
    - 3) Use to meet the cost sharing or matching requirement of the federal award.
  - b) The Project Director shall report all program income to the CGU as directed by the federal award guidelines.
  - c) The CGU will be required to report gross program income earned and expended on the Federal Financial Report.
- viii) **Property Purchases and Control**
- a) Property Control documents are compiled by the CGU and provide a description of the property, a serial number or other identification number,

and the source of the property. The acquisition date and cost of the property, along with assignment, location, use, and condition of the property are included in the documentation. The CGU further complies with LAC Title 34 Government Contracts, Procurement, and Property Control state policy in the administration of federal grants.

- b) Sole Source procurement approvals are obtained prior to entering into a non-competitive contractual relationship with a contractor where the total contracted costs exceeds \$250,000 as set forth in 2 CFR Part 200.320, with all documentation associated with the transaction retained as a part of the grant retention file.
  - c) The Project Director is responsible for obtaining documentation necessary for justification of a sole source procurement request and obtaining written approval of the formal request that the CGU submits to the grantor for sole source for review.
  - d) Consulting Fees payment approvals are obtained prior to extending payment to a consultant in excess of the Department of Justice's (DOJ's) threshold at the time of the award, or as updated by the DOJ.
- ix) Grant Modification
  - a) Project Directors will closely monitor grant expenses and notify the appropriate CGU Contracts/Grants Reviewer when the scope of a project changes, when a no-cost extension of a grant is needed or when changes to the budget are required.
  - b) The Contracts/Grants Reviewer will submit necessary grant modification requests to granting agencies and notify Project Directors when approval for a modification is received.
- x) Reports
  - a) Project Directors will ensure that all programmatic and performance measure data is forwarded to the CGU in a timely manner in accordance with the guidelines provided by the CGU and specific conditions of the grant.
  - b) The Contracts/Grants Reviewer will review all drafted financial reports. Project Directors shall provide supporting documents for these reports according to the claim schedule.
- xi) Closeouts
  - a) Project Directors will submit final programmatic and performance measure data to the CGU according to the claim schedule per guidelines in order to meet state or federal closeout deadlines.