

TOWN OF MARSHFIELD GRANT POLICY

PURPOSE: To ensure that grants are administered according to the requirements of the particular grant program, and to ensure accurate reporting of grant activity to federal and state agencies and granting agencies.

APPLIES TO: All town departments and committees, and the Jaquith Public Library

RESPONSIBILITIES

The Department applying for the grant must seek approval from the Selectboard or Library Board of Trustees before any grant application is submitted. The Department is responsible for preparing reports of grant activity to the granting agency and for submitting all documentation to the Treasurer. The Treasurer is responsible for tracking expenditures and reimbursements, and for maintaining the financial records for each grant. The Treasurer is responsible for preparing the annual State of Vermont Subrecipient Monitoring Report.

Internal control concerns/considerations:

- Selectboard or Library Board ensures that the proposed grant funds will not be used to supplant State or local funding
- Selectboard or Library Board of Trustees signs or designates one member to sign the grant application and acceptance forms
- Grants management, including compliance and reimbursement requests, is the responsibility of the departments with specific reporting requirements to the grantor and the Treasurer

Conflict of Interest

No employee, officer, or agent may participate in the selection, award, or administration of a contract supported by a Federal award if he or she has a real or apparent conflict of interest.

- Such a conflict of interest would arise when the employee, officer, or agent, any member of his or her immediate family, his or her partner, or an organization which employs or is about to employ any of the parties indicated herein, has a financial or other interest in or a tangible personal benefit from a firm considered for a contract.
- The officers, employees, and agents of the Town may neither solicit nor accept gratuities, favors, or anything of monetary value from contractors or parties to subcontracts.
- Violation of this policy will result in disciplinary actions as outlined in the Town's personnel policy.

PROCEDURE

I. Grant application & approval

- A. Town Departments seek approval from the Selectboard to apply for grants that will benefit the Town. The Librarian will seek approval from the Library Board of Trustees and will notify the Selectboard about the grant.
- B. Departments will complete and submit the grant application, signed by the appropriate Board or their designee.
- C. The department will forward a copy of the application to the Treasurer with a copy of the budget used to develop the application.
- D. If awarded, the department will forward a copy of the signed grant agreement to the Treasurer with the completed Grant Information Form.

II. Creation of grant files & recordkeeping

- A. The Treasurer will create new general ledger accounts and/or pay codes as needed to record the grant activity separately from regular expenses in the general ledger. The general ledger account description will identify the grant funding name and year.
- B. The Treasurer will maintain a report file for all grants and activity reported on those grants from inception to closure.
- C. Grant files will be maintained for a minimum of 10 years after the grant is closed.

III. Grant Expenditures

- A. All grant purchases must follow both the Town's Purchasing Policy, the Town's Procurement Policy for Grant Funds, and the procurement standards defined by the grantor (refer to grant agreement).
- B. Hiring of contractors must follow the procurement standards defined by the grantor (refer to the grant agreement) and the Town's Procurement Policy for Grant Funds.
- C. Except in the case of an emergency, no contractor may begin work until the Town has received a certificate of insurance and a completed W-9.
- D. Departments must use the attached reporting forms to document use of employee labor, use of Town equipment and materials.
- E. Departments must use the attached reporting forms to document volunteer labor and donations. Volunteer labor will be accounted for according to the particular grant agreement, but in general, a person who is performing their regular and customary work will be allocated at their customary rate; a person doing similar work that is outside their customary field will be allocated at minimum wage.
- F. When competitive bids are sought or advertised, the department will document the bid process and provide copies of all bid documents and bid results to the Treasurer. These records will include: rationale for the method of procurement, selection of contract type, contractor selection or rejection, and the basis for the contract price.
- G. Invoices must be approved by the appropriate department head and must clearly state which grant the expense falls under.
- H. The Treasurer will compare the invoice to the scope of work and budget as defined in the grant agreement.

IV. Interim activity: request for reimbursements and recordkeeping

- A. Departments will prepare the report/request for reimbursement to the grantor per the grant agreement, and deliver it to the Treasurer. The Treasurer will submit the reimbursement request with necessary documentation.
- B. The Treasurer will match up the reimbursement ACH deposit (or check received) with the grant request and ensure the proper revenue lines are credited.
- C. If the Treasurer discovers a discrepancy, an error in the general ledger coding, or incomplete paperwork the department will be alerted to the problem and the Treasurer will work with the department to resolve.
- D. If the department discovers an error or discrepancy in the grand list coding they will notify the Treasurer.

V. Year-End Reporting

- A. In January the Treasurer will review each open grant and prepare a list of income and expenditures under the grant and send it to the department or grant contact.
- B. The department will confirm the expenditures.
- C. The Treasurer will prepare the annual State of Vermont Subrecipient Monitoring Report after all grant files are reconciled.
- D. If more than \$750,000 of federal funds are expended during a year, a Single Audit will be required.

VI. Final reports & close out

- A. Departments will notify the Treasurer when all grant requirements have been met at the closure of the grant.
- B. The department will prepare the final report/request for final reimbursement and submit it to the Treasurer.
- C. The Treasurer will submit the final report and final reimbursement request with required documentation attached.

VII. Securing and reporting grant-funded assets

- A. Departments are responsible for tagging and securing assets purchased with grant funds per grantor agreements.
- B. Grant-funded capital assets must be reported on the list of Town Assets in the Town Report
- C. Capital assets are defined as a single asset over \$5,000 in value or a group purchase over \$5,000.