



Grants & Special Projects
Standard Operating Policies & Procedures
October 2023

Approved by Resolution # 1401

October 3rd, 2023



Resolution No. 1401

**A RESOLUTION OF THE PARK COUNTY COMMISSIONERS APPROVING
DEPARTMENT OF GRANTS & SPECIAL PROJECTS
STANDARD OPERATING POLICIES AND PROCEDURES MANUAL**

WHEREAS, the Board of Commissioners of Park County, Montana believe it to be in the best interest of the County to adopt the Department of Grants & Special Projects Standard Operating Policies and Procedures Manual for Park County; and

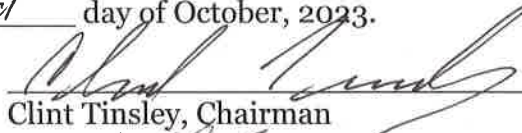
WHEREAS, the said Board of County Commissioners believes that such Policies and Procedures may accomplish the following purposes:


- Ensure that all County grant-related activity (whether through specific departments or elected offices) is consistent with the strategic priorities of the County Commission;
- Ensure the integrity of the County's good standing among grant-making entities, from local foundations to state and federal agencies and everything in between;
- Ensure accountability for financial and programmatic elements of grant management, as well as the detection and mitigation of potential grant-related problems;
- Serve as a resource for all steps of the grants life cycle including grant seeking, contract execution, post-award reporting and management and closeout for all County departments; and,
- Centralize grant seeking and management to promote collaboration and coordination of the grants process between County departments and elected offices.

NOW THEREFORE, BE IT RESOLVED by the Board of the County Commissioners of Park County, Montana, that the attached Policies and Procedures Manual is hereby adopted as the official Grants & Special Projects Standard Operating Policies and Procedures Manual for Park County; that any policies, procedures, rules or resolutions that are contrary to the attached Manual are superseded by the current Manual; if any provision of the Manual or this application of the provisions is deemed invalid or void, the remainder of the policies and procedures shall remain in force to the extent they are not invalid and void; and, the rules may not conflict with state or federal laws or regulations.


Dated this 3rd day of October, 2023.

Signed:



Clint Tinsley, Chairman


Mike Story, Commissioner

Vacant



Maritza Reddington, Clerk & Recorder

Approved as to Form:


Kendra Lassiter, County Attorney



437888 Fee: \$0.00 _____

Park County, MT Filed 10/4/2023 At 11:18 AM
Maritza H Reddington , Clerk & Recorder By MR 

**Department of Grants & Special Projects
Standard Operating Policies & Procedures**



The purpose of the Department of Grants & Special Projects (DGSP) Standard Operating Policies & Procedures (SOPP) is to provide a uniform method of planning for, researching, applying for, contracting, reporting on and managing grants as well as to outline procedures to remain in compliance with local, state and federal regulations.

The DGSP is tasked with planning and implementing grant programs and projects, researching and applying for funding opportunities, executing funder contract documents, monitoring expenditures, identifying support agencies, tracking results, reconciling budgets and project/program expenses and analyzing financial data to ensure compliance and grant reporting is conducted effectively and efficiently.

The policies and procedures outlined in this document are intended to be a basic guideline and are constantly evolving, thus regular updates can be expected.

Department of Grants & Special Projects Staff:

Kristen Galbraith, GPC, Director of Grants & Special Projects

kgalbraith@parkcounty.org

406-922-5696

Contents

GRANTS & SPECIAL PROJECTS DEPARTMENT	3
SPECIAL OPERATING POLICIES & PROCEDURES INTRODUCTION	6
GRANTSEEKING	7
APPLYING FOR A GRANT	10
COMMON APPLICATION COMPONENTS	11
APPLICATION SUBMISSION	13
POST-AWARD GRANT MANAGEMENT.....	15
I. GRANT NOTIFICATION AND ACCEPTANCE.....	15
II. MANAGING GRANTS	16
III. ONGOING PROJECT ADMINISTRATION TIPS	18
IV. CLOSE-OUT PROCEDURES.....	18
V. AUDITS	18
VI. DOCUMENT RETENTION	19
VII. OTHER PROJECT RELATED REQUIREMENTS.....	19

GRANTS & SPECIAL PROJECTS DEPARTMENT

Park County's DGSP reports directly to the Park County Commission. The Department is tasked with centralizing and streamlining the County's grant-seeking and application efforts; executing all funder contract and amendment documentation; administration, reporting and reimbursement requests of Park County grant funded awards; assistance with County audit and funder audit activities; and, providing guidance and oversight to County departments while managing post-award grant administration and reporting processes. The County Commission also allows DGSP staff time to be spent on applications for relevant area non-profits, unincorporated county communities and county-related water and wastewater districts. Decisions for staff time to be used for these activities are made via a scheduled County Commission meeting with a specific agenda item for discussion and decision.

The mission of the DGSP is to increase the County's capacity to compete for federal, state, county, corporate and foundation grants and to effectively assist in the full life-cycle of grant management from application to award activities to reporting through closeout. The aim is to increase grant-related revenue, limit the County's exposure to any grant-related legal liability and improve the efficiency and impact of beneficial community programs, projects and services funded through grant dollars.

Grant funds received by Park County support important programs, projects and services that the County provides to local communities and citizens. These funds allow the County to extend or replace pre-existing services and/or infrastructure, introduce new initiatives, gain technological advances and assist with programmatic staffing and equipment. Grant funds are allocated throughout the County and impact a variety of efforts, including public safety, public works, economic development, social services, recreation and infrastructure improvement and maintenance, among many others. Because grant funding allows the County to leverage local public funds in order to extend and enhance the services it offers to the community, the impact of grant funding in Park County is significant.

The processes involve documenting all grant awards in which Park County is named grantee; creating and maintaining a comprehensive database of grant award information (for each individual grant); distributing pertinent information to grant coordinators, recipients and sub-recipients; ensuring that grants are compliant based on programmatic, financial and legal authorities; and, serving as a resource to Park County departments.

The DGSP serves three core areas: Grants Management, Special Projects Management and Grants Compliance. Objectives of the Department involve evaluating grant program accountabilities; performing desk evaluations and site visits; maintaining County-wide grant data; assisting departments with grants related documents, questions or concerns; and, serving as a liaison to local, state and federal agencies or independent auditors in the management of grants and/or special projects per the direction of the County Commission.

More specifically, the DGSP:

1. In consultation with the County Commissioners, develops and promotes grant-seeking priorities; ensures that priorities are integrated with the County's strategic planning goals; and, serves as a key member during the County's strategic and budget planning. Grant planning and implementation projects that involve research, planning, preparation and submittal activities to include, but not limited to, the following areas of public service and community development:
 - refuse and solid waste management systems;
 - roads, bridges and transportation;
 - public safety;
 - economic development;
 - housing;
 - public health;
 - cybersecurity;
 - growth and planning;
 - disaster and emergency services;
 - parks, trails and recreation; and,
 - public relations.
2. In consultation with County Commissioners and Department Directors and staff, makes decisions on which grants will be pursued by the County.
3. Provides leadership for, and implements, a thorough grant development agenda for the County.
4. Develops, coordinates and maintains an annual calendar of planned and ad-hoc grant development activities.
5. Facilitates problem-solving processes related to multiple programs selecting and competing for the same grant/funding source.
6. Directs the preparation of complex and varied grant applications that support County goals and fiscal needs. In collaboration with County Commissioners and Department Directors/staff, identifies County needs/problems to be addressed; clarifies grant objectives; and, determines scope of grant project. Grant application preparation and submittal activities generally include (but are not necessarily limited to):
 - Work with County Commissioners, Department Directors and staff to identify projects, prioritize them and create diversified funding strategies to plan and implement
 - Facilitate and build collaborative relationships with funding agencies
7. Develops and maintains systems and procedures for grant administration activities to include (but not necessarily limited to):
 - Prepare concise and thorough applications in accordance with grant guidelines, including after-award activities to include:
 - Grant Application Preparation with all Applicable Documentation
 - Funding Agency Correspondence
 - Contract Documents and Amendments
 - Insurance Documentation (if applicable)
 - Request for Qualifications and Proposals Documentation (if applicable)

- Bid Documentation (if applicable)
 - Development of Adequate Cash Management Procedures
 - Identifying, Approving and Monitoring Match/In-Kind Requirements
 - Reimbursement Request Documentation
 - Progress and Final Reporting Documentation
 - Evidence of Monitoring any Special Grant Terms and Conditions
 - Submittal of Close-out Documentation that Reconciles with Accounting Records
 - Sub-Recipient Communications and Documentation (if applicable).
8. Facilitates community planning and citizen participation activities related to grant applications to include preparation of legal notices for public meetings, facilitation of public meetings and gathering of letters of support.
 9. Develops/maintains systems and procedures to ensure the accuracy, validity and timeliness of grant applications submitted. Responsible for the accuracy, completeness and timeliness of grants submitted to government agencies and foundations, including adherence to relevant federal, state and local regulations.
 10. Serves as lead internal consultant to the County Commissioners, Department Directors and staff regarding grant-seeking and resource development. Monitors changes/trends in the resource development environment (regulatory, political, economic, etc.) and determines resulting implications for the DGSP and the County. Serves as internal resource/expert regarding grant development trends, models and best practices; anticipates grant development needs; and, positions the County to respond.
 11. Develops and maintains external contacts to facilitate funding opportunities.
 12. Coordinates and collaborates with other institutions and entities regarding collaborative resource development efforts, including federal, state and local agencies, non-profit organizations, K-12 schools, etc.
 13. Directs the preparation of reports on the County's grant development activities as required/requested by the County Commissioners.
 14. Directs and reports on special state and federal government relief and/or direct allocations.
 15. As needed, makes presentations at conferences on grant seeking strategies and effective DGSP operations.
 16. Provides technical assistance to Finance Department staff to ensure effective grant administration and adherence to relevant government regulations.
 17. Provides assistance to the Finance Director and staff for classification of grant revenues.
 18. Manages the Park County DGSP to include:
 - Hiring, orienting, supervising and evaluating professional and administrative staff.
 - Establishing priorities for work assignments, monitoring progress, reviewing work products and ensuring products are delivered in a timely manner.
 - Formulating and recommending annual departmental budget.
 - Assessing DGSP services and implementing changes to improve grant development capacity.

SPECIAL OPERATING POLICIES & PROCEDURES INTRODUCTION

This document assists in developing, implementing and maintaining meaningful grant-seeking coordination and post-award oversight across all Park County departments. The policies and procedures contained herein are intended to foster exceptional stewardship of the public trust through a rigorous adherence to ethical standards associated with grant-related activity.

The policies and procedures presented in this SOPP aim to achieve the following:

- Ensure that all County grant-related activity is consistent with the strategic priorities of the County Commission;
- Ensure the integrity of the County's good standing among grant-making entities, from local foundations to state and federal agencies and everything in between;
- Ensure accountability for financial and programmatic elements of grant management, as well as the detection and mitigation of potential grant-related problems;
- Serve as a resource for all steps of the grants life cycle including grant seeking, contract execution, post-award reporting and management and closeout for all County departments; and,
- Centralize grant seeking and management to promote collaboration and coordination of the grants process between County departments.

GRANTSEEKING

GRANTSEEKING PROCESS OVERVIEW

The DGSP endeavors to help County departments research and apply for grant opportunities, thereby allowing each department to expand its overall capacity without placing greater burden on the County's operating and capital budgets. In order to achieve this, the DGSP must have knowledge of all department needs that can potentially be met through grant funding opportunities. Understanding a department's needs and priorities will allow the DGSP to conduct research to find possible grant opportunities that suit its needs.

The following methods will be used to match departmental needs with grant opportunities:

- I. Annual (or as needed) meetings with Department Directors
As part of the annual formation of the County's operating and capital budgets, the DGSP will meet with Department Directors to identify the current needs and priorities of the department or request needs and priorities through email communications. These identified priorities will inform regular searches of grants databases. Department Directors and/or the designated grants liaisons for each department will be notified throughout the year as promising new grant opportunities are identified.
- II. Ad-hoc grant-seeking
At any time during the year, all County employees are encouraged to bring new ideas or initiatives to the DGSP. In these cases, the DGSP will work to match ideas and initiatives to existing grant opportunities and add the information to the internal department priority lists. Department Directors and/or the designated grant liaisons for each department are encouraged to communicate with the DGSP at any time they are aware of grant opportunities that might be beneficial to their specific department or other departments.

Once a grant opportunity is identified, the DGSP will work with the Department Director and/or designated staff member to complete a high-quality application for submission.

IDENTIFYING A GRANT OPPORTUNITY

Park County's operating and capital budgets are not always realistic sources of funding for new purchases or initiatives. The DGSP generally follows the process below for grant opportunity identification and feasibility:

- I. Departments contact the DGSP with a specific need (i.e. new unfunded program, project, equipment purchase, etc.).
- II. The DGSP will utilize funding expertise to locate the most appropriate grant opportunities (if available).

- III. The DGSP will consider the following before approval by the County Commission for application process to begin:
 - a. Amount of staff time involved in administration of the grant.
 - b. Building or space issues and/or equipment purchases that could be associated with the grant request.
 - c. Special training requirements.
 - d. Conflicts of interest.
 - e. Involvement of sub-awards.
 - f. Consideration that all grant requirements can be met including completing grant requirements during the grant project period, matching requirements, reporting requirements and audit requirements.
 - g. Contribution to overall Park County mission and goals.
- IV. If the DGSP is able to match needs with promising grant opportunities, the Department will work with Department Directors and/or the designated grant liaisons for each department to begin the application process.

HOW GRANT/FUNDING OPPORTUNITIES DIFFER

Foundation Grants: Local, state and national foundations exist to contribute monies from their endowments to programs of specific interest to their founders or board of directors and/or to benefit specific locations or populations. They make decisions following their own by-laws. As such, requests for funding from foundations should reflect the unique priorities of each organization.

Corporate Grants: Corporate philanthropies are private funders who are endowed by corporations, and in some cases even receive a designated percentage of profits each year to contribute. They too make funding decisions based on their own by-laws, which often dovetail with the sector in which the associated corporation operates. Usually, a corporation's website will detail its grant-making priorities and application guidelines.

County Grants: Some counties and their associated agencies offer a limited number of grant opportunities each year which are open to local municipalities. They are often competitive.

State Grants: The State of Montana offers a number of competitive and discretionary grant opportunities for municipalities and jurisdictions through various agencies. These grants cover a wide variety of subject matter including environmental issues, public health, public safety, transportation funding, roads and bridges, communications, cybersecurity, economic development and historic preservation.

Federal Grants: The most time-consuming and competitive opportunities, federal grant applications are substantial undertakings that can require project teams working upwards of three months to successfully complete. These grants often provide very substantial funding for longer-term initiatives, pilot projects, equipment, infrastructure-related projects, etc. that may be too costly to otherwise fund. These opportunities are

often offered through relevant agencies like the Department of Agriculture, Department of Education, Department of Justice, Department of Transportation, etc.

APPLYING FOR A GRANT

Once a grant opportunity has been identified, the DGSP will schedule a meeting with the best-suited department to evaluate the competitiveness of a possible application submittal. During the meeting, the following steps will be completed by DGSP staff and department representatives:

Review the application material in-depth

- Identify minimum and maximum award amounts
- Identify start and end dates
- Identify all content and application components that must be developed for a successful application
- Identify financial implications and determine detailed anticipated project cost
- Identify match requirements and sources
- Identify partner organizations
- Identify staffing requirements (including salary and benefits increases for multi-year grants)
- Prepare documentation of a clear continuation plan*

Identify programmatic implications

- Align with Park County strategic priorities
- Align with Capital Improvement Plans
- Align with the department's goals
- Determine DGSP capacity to administer the programmatic, financial and administrative aspects of the grant

*In evaluating grant opportunities, departments are required to develop continuation (sustainability) plans prior to applying for programmatic grants. The plan should address strategies for sustaining grant funded programs should funding be reduced or terminated. Departments must plan responsibly for either termination or reduction of the program, or, plan to seek alternative sources of funding. Departments must understand that many grants are temporary and additional costs cannot be absorbed by the County's operating budget.

Upon reviewing the factors above, a decision will be made regarding whether or not to pursue the grant opportunity via a specific County Commission meeting agenda discussion item. The process below will be followed to determine the next steps for all grant opportunities:

- Formal approval by the County Commission, during a regular meeting with a grant application specific agenda item, to move forward with grant application activities

- Development of an application timeline, assignment of tasks, and, if necessary, identification of a larger project team to aide in application development
- Scheduling any necessary follow-up meetings

The process of assembling a grant application can vary greatly, as can the time commitment necessary to complete a competitive application. The DGSP generally leads this process and is always available as a resource, but departmental staff must be active contributors to the application to provide the necessary technical and operational expertise and knowledge. The following can be expected from the DGSP during the application process:

- Attendance at regular project team meetings and provision of expertise and feedback
- Grant application development and review of drafts with departments and staff members
- Assistance with securing letters of support, memorandums of understanding, letters of commitment, etc. to be included with the grant application
- Development of executive summaries, budgets, logic models and other commonly required application components

COMMON APPLICATION COMPONENTS

While each grant opportunity will have specific requirements, this section is intended to provide information that can be applied to most grant pursuits in general.

Grantee Information: Park County is the grantee, not the specific department. This means that the County is responsible for meeting all objectives set forth in grant applications – and the proper use of grant funding associated with task implementation. All grant applications must have the approval of the appropriate Department Director and the County Commission.

Executive Summary: The abstract or executive summary is a brief, page-limited overview of what the grant reviewer(s) will find in the full grant application. Brevity is important - this section should be no longer than one page unless the guidelines indicate the need for a two-page summary (or longer). Abstracts or summaries are generally written after the entire grant application narrative has been written. Attention is paid to the funder's guidelines regarding word or line limits, font sizes and margins and the structure of the abstract or executive summary. This section generally contains information about the entity submitting the proposal, the need or problem statement, objectives, methods and costs.

Project Narrative: This section clearly describes the general problem or need to be addressed by the proposed program/project.

Intended Outcomes, Goals and Measurements: This section describes anticipated outcomes of the intended work with respect to the problem or need described previously.

Methodology: This section details activities to be undertaken, describing exactly what steps are planned to reach goals and objectives. Include a timetable/project implementation table/workplan, if appropriate.

Project Staff Capacity & Organization Background: This section establishes the qualifications to carry out the project being proposed, including how the project fits into the context of long-term objectives; and, relevant experience that can enhance the activities planned to carry out with project funding. This section can also provide background information on the County and/or the department (keep in mind that those reviewing a grant application may have no knowledge of the organization or what it does). This section is a good place to share past successes to demonstrate why the County is best suited to complete the outcomes in the proposed project.

Developing a Budget: The budget describes the costs necessary to carry out the activities you have described in the proposal. The grant request budget should contain two parts (1) a budget and (2) a budget narrative (or justification). The budget will include a list of all line items and the specific dollar amounts, as well as a total cost for all expenses. The budget will also divide requests between grant funds, county contributions (in-kind or cash) and/or other funder contributions. The budget narrative is the more detailed, written explanation of how monies will be spent if the project is funded and details the calculations used to arrive at the budget figures.

***In accordance with best practices, all job postings for grant funded positions should clearly state that the position is subject to elimination when grant funding expires.

Coordinating Letters of Commitment or Support: A letter of commitment comes from a partner organization and states that the partner is committed to providing cash, staff time or other assets to the grant funded program or project, if funded. Partner organizations can commit to providing cash, facilities, technical assistance, equipment, supplies and materials or staff hours; make sure the letters provide specifics on what the partner will contribute to the project. It can be helpful to create a draft to send to the partner – be sure and give them enough time to complete a quality letter.

Letters of support should be requested from any community stakeholders who are assisting with the project/program or are in support of the project/program priorities. Letters of support should be requested early in the planning process (the number of support letters required will vary based on page limitations and/or other grant funder guidelines). It can be helpful to create a draft template for the letter writer to use in crafting their letter. Letters of support can also be written by local or state elected officials or organizations with favorable opinion of the projects/programs without specifically committing resources or funding to the proposal. Even if letters are not required, they can add beneficial relevance to the grant proposal.

Sustainability: Another important component of a grant proposal is sustainability. The sustainability section could include the plan to use the information learned from the proposed project to inform future work. Sustainability could also include how you plan to keep the project (or program) viable once all grant funds are expended. Funding agencies generally desire a long term impact and want to know that they are supporting a solid project/program with good strategic planning.

Other Supporting Documentation:

Logic Model: Logic models have become more popular with grantmakers in recent years. The logic model is a visual flowchart-style method of submitting goals and objectives.

Strategic Plan: Because grantmakers want to know that they are supporting a valuable project and solid nonprofit, they may request a copy of a strategic plan. They will use this document to see how the proposed project aligns with the overall goals of the agency/jurisdiction. The strategic plan also demonstrates that there is a long term vision and that the project/program will continue to serve the community/area for many years. The strategic plan is typically written out for 3-5 years at a time and can be included as an attachment with the grant proposal.

APPLICATION SUBMISSION

Prior to grant application submission, the application will be reviewed by the department requesting grant assistance and then placed on a County Commission meeting agenda for final submission approval and/or signatures (often the Commission Chair must sign the application submittal page documentation). The goal is to ensure that program and application materials align with established County priorities, meet the County's document quality standards, have matching funds or resources available (if required) and that the means for continuation of the project or program, after the grant period ends, have been given realistic consideration.

The DGSP is responsible for ensuring that the assessment factors noted above have been evaluated and completed prior to submission.

Departments are not authorized to submit grant applications without the prior review and approval of DGSP and the County Commission.

The process below will be followed prior to submitting a grant application:

- I. Initial County Commission approval to utilize the DGSP and apply for grant funding.
- II. The DGSP will prepare all relevant application materials (with assistance from the affected department) and review all documents with the department requesting grant funding.
- III. The DGSP will post an agenda item for discussion/decision of submittal (and applicable signature pages, resolutions, funding commitments, etc.) of the grant application at an upcoming County Commission meeting.

- IV. The County Commission authorizes application submission and the County Commission Chair and/or the Director of DGSP signs the required (including – but not limited to – signature pages, resolutions, funding commitments, etc.).
- V. The DGSP submits the application following the guidelines required by the funding agency – generally through an electronic portal format.
- VI. The DGSP uploads all application materials to the “Applications in Progress” folder on the Park County DGSP file folder system.
- VII. Upon receipt of notification that a grant will be awarded, the documentation is filed and post-award procedures (below) take place.

Pre-Award Costs: Some funder guidelines state that pre-award costs are not allowed as direct costs or allowed to meet cost share with federal awards (also called “matching requirements”). Pre-award expenditures should be carefully monitored to align with funder guidelines.

POST-AWARD GRANT MANAGEMENT

I. GRANT NOTIFICATION AND ACCEPTANCE

Grants management entails the establishment of standard operating procedures and clear, regular communication by the responsible department with the DGSP staff about the status of the grant funded project and required communication with the grantor.

Once grant funding has been awarded, project implementation and management begins. The DGSP focuses on collaboration with the funded department on the implementation, monitoring and evaluation of the grant funded program/project. The funded department, with limited oversight from the DGSP, ensures that they maintain high standards, achieves stated goals and objectives, meets agreed upon deadlines, stays within budget, expends funds as required and complies with the grantor's terms and conditions. The DGSP, with input from the funded department, will maintain appropriate records, meet financial and programmatic reporting requirements and communicate results. DGSP oversight of this process is critical to ensure that the interests and responsibilities of the County are met. In some cases, grant awards require a quick turnaround to execute grant agreements. The DGSP will work with departments to meet funder deadlines.

The process below will be followed for all grant award acceptance:

- a. The DGSP begins the process to formally accept the funds immediately upon notification of a grant award.
- b. The DGSP includes an agenda item to accept an award at the next upcoming County Commission meeting.
- c. The DGSP notifies the Park County Finance Department of the expected amount and expected receipt date of all funds, unless the grant award is on a reimbursement basis.
- d. Once the County Commission has accepted the grant award, the next stages of the grant award process begin. Grant awards will need to be signed by the Commission Chair in order for them to be accepted by the grantor and become a fully executed agreement. In addition, grants agreements may require additional signatures depending on the funder, which could include the Director of DGSP, the Finance Director, the County Attorney and/or the Clerk & Recorder.
 - o Attention to the deadline to accept a grant award is critical; some grant awards require a quick turnaround.
- e. The DGSP is responsible for sending executed and signed grant documentation to the funding agency. This includes varieties of transmission (paper, electronic and/or both). The final award document (executed award) will be sent from the grantor. When fully executed copies are received, departments, the DGSP will save all executed agreements in the master electronic folder file.
- f. The DGSP will work with the Finance Department to establish unique revenue and expense codes for managing deposits and expenses related to the grant funded project/program. If the grant award is prepaid, funds are deposited and spent out of the department's designated grant revenue account. Most grants are on a

reimbursable basis and require backup documentation of expenses and proof of payments of those expenses before grant funding is released to the County.

Partner Organizations: There may be circumstances in which Park County will partner with an outside organization. For example, the County is often approached by local non-profits, water or sewer district authorities and/or other agencies to serve as the lead applicant for grant opportunities that are only open to specific municipalities. As the lead applicant, the County assumes all the responsibilities for the grant, and must contract with the secondary organization. In the case of all partnerships, a Cooperation Agreement between partner organizations is required.

A Cooperation Agreement is a document which outlines each organization's roles and responsibilities in fulfilling the grant requirements. The DGSP will be instrumental in writing the agreement which will be approved by the County Attorney's Office, and then be included into the process of accepting the grant award.

Sub-Recipients: If the County acts as a pass-through entity and provides sub-awards to other entities/non-profits, the County must meet the requirements of 2 CFR 200.331 and 200.343:

- 200.331 Requirement for Pass-Through Entities
 - Include the audit responsibilities in the award that they must have single audit according to 2 CFR 200.500-521.
 - Provide the sub-award information regarding the CFDA # of the grant.
 - Provide an indirect cost rate, if applicable.
 - Perform a risk assessment for sub-recipient monitoring.
 - Verify compliance to audit requirements, which include monitoring and single audit findings.
 - Report the sub-award in accordance with FFATA (Federal Funding Accountability and Transparency Act).
- 200.343 Closeout
 - The sub-recipient has 30 days after the period of performance to submit reports and one year to close out the grant, if the grant award is over \$25,000.

II. MANAGING GRANTS

Once grant funding is awarded, accepted and contracted, departments assume responsibility for accurately expending grant funds in accordance with the budget as well as implementing the scope of work for the project. There are unique financial and implementation requirements for every grant. The DGSP is available to assist with any questions about these requirements.

Grant Implementation Plan: All departments that receive grant funding must work with the DGSP to develop a Grant Implementation Plan that identifies the goals and objectives to be achieved, the project timeline, milestone events, an anticipated expenditure schedule, roles and responsibilities and grantor terms and conditions. The purpose of this

plan is to ensure that all grant funded programs or projects are managed according to the terms set forth in the grant agreement and the DGSP SOPP.

Procurement: All procurement activity associated with grant funds must be consistent with the County's established procurement policies and procedures, as well as the approved grant budget and overall requirements of the grantor (see Section VII).

Requests for Payment/Expenditures: The DGSP will request payment from the funder if funding is on a reimbursement basis. The specific payment method will be disclosed in the executed agreement. All copies of payment transactions will be kept as project/program documentation by the DGSP. Requests for payment documentation is required for federal and state grants and necessary in order to avoid audit findings. The DGSP will periodically meet with departments throughout the life cycle of the grant to reconcile grant expenditures based on the grant award budget. Expenditures and claims go through the County's regular approval process.

Grant Funded Positions: In accordance with best practices, all job postings for grant funded positions must clearly state that the position is subject to elimination when grant funding expires.

Progress Reports: Most funders require progress reports, which can vary greatly in required narrative. Departments must submit narrative for progress reports (if required) on time to the DGSP for timely submission of the formal report. Timely submission is necessary to avoid audit findings and/or hold up payments for Park. Progress report deadlines will be sent via email to the associated Department from the DGSP. If the DGSP is not completing and submitting the progress reports, the associated department is required to send required report information to the DGSP for submittal and filing.

Interim Reports: Funders may require additional reports in addition to progress reports. One example would be a semi-annual financial report required by most federal grants. As with the other reports, departments must submit interim reports on time and forward all copies to the DGSP for electronic filing.

Budget or Programmatic Changes to the Grant: Funders must approve any significant budget or programmatic changes through a written request. For example, if an item costs significantly more or less than what was proposed in the grant application budget, if there is a change of staff, or a change in project scope, departments will need funder permission to implement changes. If a modification request is not submitted, it is likely that grant funds will need to be returned (to the Grantor) or they will not be reimbursed, etc. Departments that anticipate significant changes in budget or scope of work/project goals should immediately contact the DGSP to discuss an action plan. Note: Budgetary and program discrepancies are often revisited even years after a grant has closed when the grant is undergoing an audit.

Award Extension Requests: If a project is taking longer to complete than originally anticipated, the DGSP will work with the impacted department to send messaging to the funder to request an extension, within 60-90 days prior to the end of the grant period.

III. ONGOING PROJECT ADMINISTRATION TIPS

- Keep in touch with the funding agency and program managers, as needed.
- Meet with Grants Department staff regularly.
- Keep on track with process objectives and performance measures.
- Collect necessary data and complete required evaluation processes.
- Maintain communication with any contractors and other partner agencies.
- Share all necessary information to assist DGSP with reporting and reimbursements. (usually quarterly and/or annually).
- Review expenditures on a monthly basis.
- Use a box folder or binder to maintain paper records of grant activities and budget expenditures (or do that with file cabinets or an electronic system) that will be needed by the DGSP. The DGSP is responsible for creating a record keeping system to track the documents for each particular grant, tracking documents using an electronic system or use some combined approach using these methods. The DGSP will work closely with the grant-funded department to make sure all records are compiled for proper reporting and reimbursement requests.

IV. CLOSE-OUT PROCEDURES

As grant awards comes to an end, final documentation is required to be submitted for final close-out. This documentation will usually include a final financial statement and a final programmatic report.

Some federal and state grants allow a 90-day period for closeout procedures, which may include completing grant reports and completing evaluation activities to verify grant impacts and adherence to measurable outcome objectives. Many funders allow this time spent closing out the grant to be billed to the grant, although all other project costs are no longer allocable. It is customary that funders allow 30 days for invoicing and paying costs that occurred during the grant period. However, each funder is different so verifying requirements with them, before making any assumptions is essential.

The following process will be followed for grant award closeout:

- The DGSP will meet with departments one to three months prior to the end of grant close-out period to discuss any procedures and/or developments and to ensure submission of final paperwork.
- If a Cooperation Agreement was included in the grant paperwork, the DGSP will also ensure that all paperwork from the partner organization is submitted.
- The DGSP will request a formal close-out letter or other documentation signifying the finality of the grant funding.
- The DGSP will upload final documentation to the electronic file folder.

V. AUDITS

An independent review of the Park County grant-related records in the form of an audit can take place at any time. The goal of an audit is to ensure that the County has fully

complied with all requirements of a given grant agreement and to verify the accuracy of all associated financial records. Some audits are predictable and take place on a regular basis, while other audits are performed by funders on an ad-hoc basis.

Certain types of grants that are automatically audited on a yearly basis include the following:

- The Single Audit is a yearly review overseen by the Finance Department and conducted by an outside entity. During the process, auditors review all federal grants as well as any grants in which the source of funds originated from the federal government (called federal flow-through grants). The audit includes all expenditures and receipt of payments for all relevant grants.
- The State of Montana and their various departments regularly audit grant funds awarded to the County.
- Federal agencies and their various departments regularly audit grant funds awarded to the County.

The possibility for a grant audit always exists, which underscores the importance of records retention (see Document Retention section below for details). Departments should contact the DGSP immediately in the instance that a grant is being audited.

VI. DOCUMENT RETENTION

Grant documentation must be kept a minimum of five years (but sometimes longer) past the official close of the grant. If the grant is re-opened due to an audit, the five years starts from the end of the audit. All records must be retained including receipts, any spreadsheets, grant award documentation, required forms, etc.

VII. OTHER PROJECT RELATED REQUIREMENTS

Required Procurement Actions

As per Resolution 1198, the Park County Commission approved a Park County Procurement Policy, to ensure uniform, transparent and equitable rules regarding the purchase and procurement of goods and/or services with public funds.

The table below summarizes required actions in the purchase of goods and/or services at specified monetary levels. Quotes may be verbal with a note indicating who the quote was taken from and the amount quoted.

Amount	Required Actions
\$0 to \$4,999	Documented competitive pricing is not required, however due diligence shall be given to the County's goal of maximizing the purchasing value of public funds.
\$5,000 - \$24,999	Minimum of 2, preferable 3, a notation of telephone/written quotes should be attached to the purchase order (PO).
\$25,000 +	PO required. Minimum of 2, preferably 3 quotes (with notation of telephone/written quotes attached to the PO).
\$20,000 +	For professional services of architects, engineers and land surveyors, a Request for Qualifications (RFQ) is required.
\$80,000 +	Competitive sealed proposals or invitations to bid are required.

Park County's Bid Tabulation form should be used to document competitive pricing for purchases less than \$80,000.

If through the exercise of properly documented due diligence, the minimum number of quotes cannot be obtained, then the purchase may proceed with a written explanation attached to the claim or the PO.

There is nothing stated in the Park County Purchasing Policy that prohibits the use of formal competitive practices for the procurement of goods and/or services for any threshold. The decision to use formal practices should be made by the Department Director/elected official based on such criteria as market competitiveness, time constraints and complexity of specification to be used.

Procurement

All purchases exceeding \$25,000 must be pre-approved by the County Commission. The use of a PO is how the pre-approval is documented. Department Directors and/or elected officials are responsible for filling out the PO form with all proper information, in addition to obtaining Commissioner written approval prior to ordering materials, equipment or services of \$25,000 or more. In the case of competitive bidding, the purchase order will refer to a contract. The Finance Department has procedures for maintaining and distributing POs.

On occasion, exigent circumstances will require emergency purchases. If not commissioner is available to approve a purchase over \$25,000, the Department Director/elected official shall notify the County Commissioners as soon as possible about the purchase that was made and the conditions that existed to warrant a purchase without a PO. However, an emergency allowing for purchase without a PO does not relieve the County from the competitive bidding requirements.

Competitive Bidding

Formal bid solicitation is required by Section 7-5-2301, Montana Code Annotated (MCA), for the purchase of any vehicle, road machinery or other machinery, apparatus, appliances, equipment or materials or supplies or for construction, repair or maintenance in excess of \$80,000. Through the adoption of the Montana Procurement Act, the County must solicit competitive sealed bids (awarded to the lowest responsible bidder) or may solicit competitive sealed proposals (awarded based on the published solicitation review criteria). The County must additionally solicit for the professional services of architects, engineers and land surveyors if the services will be in excess of \$20,000.

Whenever using the competitive sealed bid proposal or qualification process, specifications must be appropriate, accurate, reasonable and fair. "Specification means any description of the physical or functional characteristics or of the nature of a supply or service. It may include a description of any requirement for inspecting, testing or preparing a supply or service for delivery. All specifications shall promote overall economy for the purposes intended and encourage competition...and may not be unduly

restrictive.” MCA 18-4-231; 18-4-234. Specifications should be for the purpose of generating competitive bids, proposals and/or qualifications so that the County may obtain the best value and vendors are provided a fair opportunity to consider the project or procurement requirements.

When using a competitive bid process, a selection committee may be formed to review the bids, proposals and/or qualifications. The selection committee must be evenly divided by members of the office, department or board seeking the procurement and members of other County offices or departments. County Commissioners should not be members of the selection committee because Commissioners act on the recommendation of the committee.

All bid, proposal and qualifications procedures must be done in compliance with the law, including but not limited to, legal procedures for advertising, proposal specifications, opening and awarding. All formal procedures must be coordinated between the County Commission and the County Attorney’s Office.

County elected officials, Department Directors and applicable board members must be aware and follow all labor laws, including but not limited to, those in relation to hiring of independent contractors, the requirements of public works contract over \$25,000 to contain prevailing wage language (MCA 18-2-422) and Contractors Gross Receipts Tax for public works contracts (MCA 15-5-205).

Emergency Exception to Competitive Bidding

There are times when competitive bidding is not possible because of emergency, disaster or other exigencies. Poor planning is not an emergency. Per MCA 7-5-2304, the emergency exception to competitive bidding requirements applies when a situation is “made necessary by fire, flood, explosion, storm, earthquake, other elements, epidemic or riot or insurrection; for the immediate preservation of order of the public health; for the restoration of a condition of usefulness that has been destroyed by accident, wear, tear or mischief; or, for relief of a stricken community overtaken by calamity.” However, such procurement shall be made with such competition as is practicable under the circumstances to receive the lowest price and best value. A written determination of the emergency and for the selection of the particular contractor shall be maintained in the public record.

The County seeks to obtain the best value at the best price to optimize the use of public funds and resources. The County reserves the right to negotiate with vendors and will make every reasonable effort to acquire the best value and quality through competition. In some cases, the best value may not be the lowest purchase price outside the formal bidding/proposal/qualification process. Consideration should be given to quality, reputation, serviceability, maintenance, costs of operation and ownership, warranty, suitability for particular purpose and other considerations.

The County Attorney’s Office will review all contracts for goods and/or services made pursuant to these rules prior to contract finalization. In addition, all formal

bidding/proposal/qualification processes shall be conducted through the County Attorney's Office.