

ADMINISTRATIVE CODE
BOARD OF COUNTY COMMISSIONERS

CATEGORY: Financial/Fiscal/Budget

CODE NUMBER: AC-3-17

TITLE: Grant Program Administrative Procedures
(Manual Appendix "A")

ADOPTED: 8/8/90

AMENDED: 4/28/93; 09/12/00; 11/15/02; 01/24/12;
06/20/2023

ORIGINATING DEPARTMENT: County
Administration/Budget Services

PURPOSE/SCOPE:

The purpose of this Administrative Code is to establish the Lee Board of County Commissioners' (BoCC) Notice of Policy for Grants Administration and establish the Lee County Grants Administration Manual, under separate cover as Appendix "A".

POLICY/PROCEDURE:

I. Grants Administration Notice of Policy

It is the policy of the Lee BoCC to establish and maintain a Grants Administration Program that supports the pursuit of grant funding and the implementation of grant-funded projects to accomplish the timely expenditure of funds, successful completion of tasks and submission of deliverables, and the desired outcome of the projects and grants. The Program will comply with Grantor funding agreements and requirements; BoCC Administrative Codes; the Lee County Procurement Management Ordinance; the Lee County Employee Policy Manual; the Lee County Clerk of Courts General Accounting Office - Finance Department policy and guidebooks for fiscal management; and federal and state requirements applicable to funding agreements.

It is the policy of the BoCC to apply the high standards of compliance, efficiency, quality assurance/quality control, and ethics that are implemented in these regulations and in Lee County's "One-Org" culture of honesty, collaboration, trust, innovation, and professionalism to obtain alternative funding to meet the County's needs. The BoCC expects grant operations to emphasize an ownership and control environment, risk assessment and management, activity controls, information and communication, and activity monitoring.

It is the policy of the BoCC to hold staff involved with the Grants Administration Program accountable for reporting observed misuse of funds, fraud, or criminal activity related to grants. Lee County's Human Resources Policies and Procedures Manual describes the means for employees to confidentially report suspected violations of policies and or suspected instances of fraud or other criminal activity, including those related to federal grant programs, additionally a Grantor and grant program may require specific procedures for reporting fraud, waste, and abuse. Management will address breaches of the code of conduct, ethics policy, instances of fraud, or other criminal activity; take remedial actions to prevent future violations; and notify the appropriate state or federal agency as required.

This policy is implemented through a systematic and unified Grants Administration Program that:

1. Establishes the Grants Administration Manual as the comprehensive guidance to implement the Grants Administration Program which:
 - Provides the framework for grants administration under the County Manager's Office and the County's Departments. Additionally, as it relates to grants management, the manual references the Board's policies, processes, and procedures; significant federal and state laws; and regulations.
 - Applies to all grants pursued by and awarded to Lee County.
 - Describes specific roles and responsibilities of employees related to the Grants Administration Program.
 - Establishes that all provisions of this manual apply to agents, contractors, and subrecipients who perform functions associated with any award or pass-through award.
 - Focuses on the most common federal and state compliance requirements for grants management. The manual is not a final and all-inclusive guide to compliance. Each grant funding agreement, terms and conditions, and guidance from the Grantor must be reviewed for compliance deliverables and required activities.
 - Complements department procedures. Any conflicts with department procedures or Grantor requirements will be brought to the attention of the Grants Management Coordinator to help develop a solution to the conflict.
2. Defines the administrative and operational roles and responsibilities to ensure the timely expenditure of funds.
3. Outlines the internal processes for ensuring compliance, efficiency, and ethics that generally follow the Committee of Sponsoring Organizations (COSO) Framework (<https://www.coso.org>) for internal controls to provide reasonable assurance that the County is operating ethically, transparently, and in accordance with established regulatory requirements. The processes address the policy expectations to:
 - Identify and vet projects that are appropriate candidates for grant funding;
 - Research and identify grant funding opportunities for select projects and services;
 - Track grant awards/projects and manage expenditures of the grantee and subrecipients, program income, accomplishment of tasks, and submission of deliverables within compliance requirements through a central Grants Management Information System (GMIS) that tracks grant requirements, objectives, and status. The information system will be sufficient to provide transparency and reports to make data-driven decisions related to grants;
 - Define the performance metrics to analyze the program's effectiveness; and
 - Document program processes and procedures.
4. Establishes that subrecipients, contractors, and others involved in Lee County grants are subject to this policy and its related regulations, and that staff have additional compliance responsibilities as it relates to these relationships.
5. Establishes the requirement that all staff, subrecipients, contractors and others involved in the Grant Administration Program understand its federal, state, and local regulatory requirements.
6. Establishes the requirement for continued grants-related training and development as the foundation for compliance and success of the program.
7. Emphasizes that staff who fail to comply with the provisions of this manual will be subject to all job performance review policies as outlined in the Lee County Employee Manual. This provision extends to consultants or other contractors or vendors under the Lee County Procurement Ordinance and all of its provisions for evaluation of performance. The provision includes the expectation of compliance with any grant-specific action plan, compliance outline, funding agreement or other grant-

implemented document adopted by the Board of County Commissioners or signed by the Chairman of the Board, the County Manager, or their designee.

II. Procedure for Maintenance of the Manual

Revisions to the Notice of Policy for Grants Administration will be documented through an agenda item for the Board of County Commissioners to amend the Administrative Code.

The Manual (Appendix A) may require updates and revisions based on federal, Florida, or BoCC laws, regulations, and guidance. Additionally, processes, workflows, job aids, training tools, support technologies, and other circumstances may necessitate updates and revisions to the manual. The County Manager or designee has been given the authority to revise or add, without further Board approval, all other sections of the Manual.