

ROCKDALE COUNTY, GEORGIA
GRANTS MANAGEMENT POLICY MANUAL



PREPARED FOR: ROCKDALE COUNTY BOARD OF COMMISSIONERS
PREPARED BY: ROCKDALE COUNTY GRANTS MANAGEMENT DEPARTMENT
VERSION: 3.0

TABLE OF CONTENTS

1. INTRODUCTION

- 1.1 Rockdale County Grants Management
- 1.2 Purpose of the Grants Policy Manual
- 1.3 Grants Administration
 - 1.3.1 Grants Management
 - 1.3.2 Budgeting
 - 1.3.3 Procurement
 - 1.3.4 Personnel
 - 1.3.5 Accounting/Reporting
- 1.4 Certifications

2. PRE-DEVELOPMENT

- 2.1 Pre-Development
 - 2.1.1 Planning
 - 2.1.2 Solicitations
- 2.2 Grant Application Process
 - 2.2.1 General Description
 - 2.2.2 Grant Application Procedures (Internal Applications)
- 2.3 Approval of Electronic Submission
- 2.4 Grant Consultants
- 2.5 Notice of Grant Award

3. OPERATIONAL (Grants Programmatic and Fiscal Management)

- 3.1 Execution
 - 3.1.1 Grant Award Notification Procedures
 - 3.1.2 Automated Clearing House (ACH) Enrollment Form
 - 3.1.3 Purchasing
 - 3.1.4 Request for Proposals
 - 3.1.5 Grant Contracts and Reporting
- 3.2 Record Keeping
 - 3.2.1 Time and Effort Certification
 - 3.2.2 Record Retention
 - 3.2.3 Acceptable Grant Files
- 3.3 Reports
 - 3.3.1 Grant Reporting Procedures
 - 3.3.2 Submitting Reports
 - 3.3.3 Types of Reports

4. COMPLIANCE

- 4.1 Purpose of Compliance

- 4.2 Internal Oversight
- 4.3 Grant Governance
 - 4.3.1 Governing Authorities for Federal Grants
 - 4.3.2 Governing Authorities for State Grants
- 4.4 Grant Evaluations
 - 4.4.1 Evaluation of Subrecipients
 - 4.4.2 Desk Evaluations
 - 4.4.3 Site Visits
 - 4.4.4 Evaluation Documents
- 4.5 Technical Assistance
- 4.6 Occurrences that Call for Grant Staff to Notify Finance Immediately
 - 4.6.1 Key Personnel Changes
 - 4.6.2 Notice of Audit, Monitoring Visit or Review
 - 4.6.3 Grant Misconduct

5. GENERAL GRANT REGULATIONS

- 5.1 UEI Number Requirement
- 5.2 Debarment and Suspension
- 5.3 Federal Funding Accountability and Transparency Act (FFATA)
- 5.4 Code of Federal Regulations and Office of Management and Budget Circulars
 - 5.4.1 Uniform Administrative Requirements
 - 5.4.2 Cost Principles
 - 5.4.3 Audit Requirements
- 5.5 Equal Service Provider
 - 5.5.1 Title VI
 - 5.5.2 Limited English Proficiency (LEP)
 - 5.5.3 Americans with Disabilities Act (ADA)
 - 5.5.4 Other National Policies - Miscellaneous

6. GRANT RELATED FORMS

7. APPENDICES

- 7.1 Glossary

8. BOARD OF COMMISSIONERS APPROVAL

1. INTRODUCTION

The purpose of the Grants Policy manual is to develop, implement, and maintain comprehensive grant oversight and interdependent coordination for Rockdale County to increase grant related matters to improve the efficiency of the program implementation for qualitative and quantitative aspects. It is the desire of Rockdale County to adhere to grant compliance for all granting agencies and programs including but not limited to fiscal management on a county level, but program level administrative tasks, program implementation of evidence-based practices, mandatory financial and performance reports, evaluation of programs to meet grantee mandates but also to demonstrate the positive impact of said programs and to leverage program success for sustainability measures.

The Policy Manual will provide a uniform method of applying for and managing grants, as well as outline how to remain in compliance with local, state, and federal regulations. Specifically, policies reflect the “rules” governing the components of grant funding. Procedures represent an implementation of policy and will continue to evolve as new best practices emerge. These procedures include best practices to applying for grant funding after a program has truly identified a problem or gap-in-service, identified S.M.A.R.T. goals and objectives, identified solutions with evidence-based practices, and identified budget requirements to ensure a focus on solving problems and not simply seeking funding for the sole sake of seeking additional funds. Upon receiving an award for said proposals, Grants Management and Program Administrator will establish policies to adhere to ensure compliance with regulations, reports, and fiscal management.

The definition of a grant for the purpose of this policy is: An award of financial assistance in the form of money or property by a funding source including federal, state, and local governments, non-profit agencies, and private businesses, trusts, foundations, and citizens that the Rockdale County Board of Commissioners (the County) has the authority to accept or reject.

The structure of this manual outline three main sections: Development of Proposals, Program and Fiscal Management of Grant, and Compliance. The policies and procedures outlined in this document are intended to be basic guidelines and to be amended as practices evolve.

1.1 Rockdale County Grants Management Division

Rockdale County grants oversight is managed by Grants Management, a Division of the Rockdale County Finance Department, to streamline grant application, award, and management processes. The processes involve documenting all grant awards in which Rockdale County is named grantee, creating and maintaining a comprehensive database of grant information, distributing pertinent information

to grant coordinators, recipients, sub-recipients, ensuring that grants are compliant based on programmatic, financial and legal guidelines, and serving as a resource to County departments, agencies, and elected offices. The Finance Department serves two core areas for grants: Grants Management and Grants Compliance.

Objectives of the Grants Management Division involve evaluating grant program accountabilities, maintaining county-wide grant data base, assisting department with grant related development, documents, proposals, and compliance tasks. The Division will serve as a liaison to local, state, and federal government agencies in the management of grants per the direction of the county administration.

1.2 Purpose of the Grants Policy Manual

Rockdale County Government is responsible for applying uniform methods to the development, application, management, and compliance of all grants funded revenue. To sustain the County's mission to serve citizens involving grants, policies and procedures governing the components of grants management must be documented and communicated county wide. The Grants Management Division serves to establish grant policy and procedures, update them as best practices emerge; new requirements are introduced by grantor agencies and as risks evolve in response to internal or external change. The centralized oversight of County grants is designed to increase the overall effectiveness of Rockdale grants.

All departments and elected offices within the auspices of the Rockdale County Government will be supplied with this policy manual and subsequent updates upon release by the Grants Management Division. An acknowledgement of receipt will accompany each manual and update to be signed by the appropriate department management and elected official and returned to Grants Management Division.

1.3 Grants Administration

Rockdale County Board of Commissioners serve as the official signatory for all grants regardless of the department or elected office receiving grant funds.

Rockdale County staff and subgrantees are responsible for fulfilling all aspects of the grant contract including administrative, programmatic, and financial components while adhering to all governing authorities that legally bind Rockdale County Government to the Grantor through grant agreements.

1.3.1 Grants Management

Each department, agency, or elected office shall budget and manage its grant funds in accordance with the grantors and the County's fiscal policies. Compliance with special conditions or any other grantor requirement/guidance as outlined in the grant shall be the responsibility of the department, agency, or elected office obtaining the grant and will coordinate with other county programs in a timely manner to fulfill any unique stipulations associated with the grant.

1.3.2 Budgeting

As applicable, grants should be incorporated into the County's budget process. This shall be separate from the initial process requesting authorization to solicit, apply, accept, and budget for the grant. Differences in the grant amount awarded and the budgeted amount adopted by the County will require a budget adjustment via the County agenda process. The department, agency, or elected office should work with Grants Management Division in determining adjustment(s) required.

1.3.3 Procurement

All purchasing policies and procedures shall be followed, as they apply, for the purchase of goods, services, or construction made with grant funds.

1.3.4 Personnel

All human resource policies and procedures shall be followed, as they apply for the administration of the grant award including but not limited to compliance with the Equal Employment Opportunity Plan requirement. All exempt employees will be paid bi-weekly, while non-exempt employees submit timesheets, approved by the employee's direct supervisor, to review, comparing timesheets hours submitted and the actual hours worked before submitting to Finance to proceed with the check request process. *These procedures are consistent with requirements of Title 2 Code of Federal Regulations CFR) Part 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards.*

1.3.5 Accounting/Reporting

Grant recipients shall be responsible for the following:

- A) Expenditure Control** – only grant-related expenditures shall be charged to the grant account. All expenditures must meet the authorized use of funds as per the grant agreement. Grants Management Division and Finance Department must be notified and provided with documentation required to record capital equipment or fixed assets. Grant programs should not use grant funding to supplant current County funding.

-
- B) Reporting** – the grant program shall ensure all procedures and requirements are followed in preparing and submitting programmatic project reports, and any other documents as outlined in the grant agreement in a timely manner. All financial reports, reimbursement requests and close out reports will be developed by the Grants Management Division.
- C) Supporting Documentation** – the grant project shall provide to the Grants Management Division additional information required to support the grant transactions including:
1. All correspondence with the grantor
 2. Grant agreement
 3. Amendments
 4. Extension requests and authorizations
 5. Requests for reimbursement with summary backup
 6. All reports – financial, program/project related
 7. Close out reports

1.4 Certifications

The Grants Management Division is responsible for maintaining certifications on behalf of Rockdale County Government, including but not limited to the Unique Entity Identifier (UEI) number and registration within System for Award Management (SAM). The Grants Management Division will monitor and maintain all necessary certifications with SAM.

2. PROPOSAL DEVELOPMENT

County staff should notify the Grants Management Division of significant grant related activities such as grant planning, grant development and submission, grant approval, grantor site visits, grantor program services, key staff changes, misconduct involving grant program financial and programmatic activities, client complaints, etc. These notifications allow the Grants Management Division to track County grant initiatives more effectively during the lifecycle of a grant. All notifications should be directed to the Grants Management Division leadership.

2.1 Proposal Development

2.1.1 Planning

Before an application for grant funds can be created, the program should employ a process to identify needs or gap-in-service preventing a complement of services to the citizens. Employing a strategic planning process will assist in the identification of needs and potential solutions via evidence-based practices. Subsequent, all planning for grant application/proposals will be strictly aimed at solving problems or enhancing successful programs.

Departmental planning will be done with proven strategic planning processes provided by the Grants Management Department beginning with conducting a needs assessment in proper form to determine gaps-in-services. It is important to include in the assessment experienced staff, third party experts, and end users or those with lived experience.

With identified gaps-in-services, the department will conduct research to identify evidence-based practices (more than one) for review to determine the best solution. After discovery of evidence-based practices, the department can research grant databases to identify potential sources of funds.

2.1.2 Solicitations

The BOC encourages the pursuit of any such grants provided that all fiscal implications, such as matching funds and continuing costs, are clearly identified in advance. The parties pursuing a submission of a proposal should seek the guidance of the Grants Manager for available funding opportunities.

2.2 Grants Application Process

The Grants Management Division will be in the development and coordination of grant applications. As a best practice, all county staff and officials shall notify the Grants Manager or designee prior to a grant application being submitted wherein Rockdale County Government is named grantee.

NOTE: The application and a signed Grant Budget Summary Form must be submitted to the Grants Manager for review, modification, and prior approval.

2.2.1 General Description

Rockdale County GMD is the clearinghouse through which the grant process flows from department staff to administration. The procedures outlined herein should be followed for development and submission of grant applications.

2.2.2 Grant Application Procedure (Internal Applications)

- A) Identification:** Potential grant funding sources might be identified by staff and officials or by the GMD through all sources including government and private publications via internet or other means.

-
- B) **Notification:** When grant opportunities are identified by any staff or officials and determined to apply, the GMD should be notified. Notification should include:
1. Source of grant funding.
 2. Department or Office interested in applying and contact information.
 3. Estimated amount of funding to be requested.
 4. Application due date.
 5. Summary of project to be funded.
 6. List of potential “partners” to be included.
- C) **Review of application and compliance:** GMD will review the information provided to determine suitability of proposed program to meet the grant guidelines. Grants Manager will also review required assurances to ensure County’s ability to comply. Review process takes three to seven days unless additional research of the grant program is needed. Feedback will be provided to the applicant regarding and/or any potential compliance issues.
- D) **Matching, Level of Effort, and Earmarking**
1. Matching or cost sharing includes:
 - a. Requirements to provide contributions (usually non-Federal) or a specified amount or percentage of match Federal funds.
 - b. Matching may be in the form of allowable costs incurred or in-kind contributions (including third-party in-kind contributions).
 2. Level of Effort includes:
 - a. A specified level of service to be provided from period to period.
 - b. A specified level of expenditure from non-Federal or Federal sources for specified activities to be maintained from period to period.
 - c. Federal funds to supplement and not supplant non-Federal funding of services.
 3. Earmarking includes:
 - a. Departments and officials are required to document the minimum and/or maximum percentage of the program’s funding that

must/may be used for specified activities, including funds provided to subrecipients.

- b. Earmarking may also be specified in relation to the types of participants covered.

Adequate documentation will be maintained to support compliance with matching, level of effort, and earmarking requirements. Such information will be made available to administration, auditors, and pass-through or grantor agencies, as requested.

- E) **Distribution to other departments or official staff:** When appropriate, grant information will be disseminated to other department directors, elected officials, and staff, promoting an opportunity to include other programs where appropriate, thus strengthening the application, and to avoid duplication of effort or competition among departments for available grants. Feedback from other departments, officials, and other collaborations identified will be forwarded to the initiating department or office.
- F) **Grant Development Process:** The GMD will work directly with department or official staff on grant applications as follows:
 - 1. Provide technical assistance on compliance issues such as EEO plans; Title VI; Lobbying concerns, and Drug Free Workplace programs.
 - 2. Research evidence-based practices.
 - 3. Assist with bringing additional public and/or private partners to the grant process, where applicable.
 - 4. Assist with writing performance outcomes measures.
 - 5. Serve as a central point of contact for the grant.
 - 6. Provide technical assistance in writing the application and/or completing necessary certifications and forms.
 - 7. Facilitate the involvement of an outside grant writer or consultant when appropriate.
 - 8. Review draft application/suggest edits.
- G) **Technical Review:** All grant applications for the county are subject to technical review by GMD. Recommendations for revisions by the GMD will be incorporated in the final application.

-
- H) **Final Review and Preparation for Submission:** Final grant applications will be prepared for signatures by the department or official staff and submitted to the GMD. The GMD will prepare a monthly application summary report to be submitted to the Chief Operating Officers (COO) for ratification and Chair signature.

2.3 Approval for Electron Submission

Grants submitted electronically may not require the signature of the Chair; however, these grants are subject to the same review process outlined in Section 2.2.2.G. The final grant application will be prepared and submitted to the Grants Manager. When applications require signature of the Chair prior to submission, the GMD will prepare a summary and forward to the COO for ratification and signature of Chair. Requests are required to be presented three days prior to the due date.

2.4 Grant Consultants

When a grant writer or consultant is contracted, the GMD will continue to be involved in the grant development process, serving in an advisory and/or technical assistance capacity to ensure the administration is represented. Grant applications prepared by independent consultants will be subject to final review by the GMD and are subject to the same approval process as outlined in Sections 2.2.2 and 2.3. If the county utilizes a consultant for the administration of federally funded programs, the county will coordinate with the federal awarding entity to ensure the consultant rates are:

- A) Consistent with any statutory or programmatic thresholds applicable to the program.
- B) Pre-approved in writing by the federal awarding entity based on documented justification provided by the county.

2.5 Notice of Award

The means by which departments or officials can be notified of a grant varies. Grant award notices can be sent to the Chair, and/or other designated staff or officials via email, regular mail or other delivery mechanisms. Once a notice of a grant award is received, project implementation processes begin with notifying the GMD.

Rockdale County staff and officials shall forward a copy of the grant award agreement and support documents to the Grants Manager upon receipt of notice. GMD should receive department/official, staff contact name, contact information of granting agency, special terms and conditions to signed and submitted, and

GMD will submit grant award to the BOC for approval of acceptance and subsequently assign a grant fund account number to the project.

A) Expected Assurances for Federal Grants

The following are components, but not limited, of assurances expected by federal grants for the BOC to agree to adhere. These assurances are normally part of the award acceptance package requiring BOC signatures and returned to granting agency.

1. Applicability of Part 200 Uniform Requirements
2. Requirement to report actual or imminent breach of personally identifiable information (PII)
3. Required training for Grant Award Administrator and Financial Manager
4. Safe policing and law enforcement subrecipients
5. Effect of failure to address audit issues
6. Requirements of the award; remedies for non-compliance or for materially false statements
7. Compliance with regulations pertaining to civil rights and nondiscrimination – 28 C.F.R. Part 38
8. Compliance with regulations pertaining to civil rights and nondiscrimination - 28 C.F.R. Part 42
9. Compliance with regulations pertaining to civil rights and nondiscrimination - 28 C.F.R. Part 54
10. Compliance with 41 U.S.C. 4712 (including prohibitions on reprisal; notice to employees)
11. Compliance with applicable rules regarding approval, planning, and reporting of conferences, meetings, training, and other events
12. Requirement for data on performance and effectiveness under the award
13. Determination of suitability to interact with participating minors
14. Requirement to disclose whether recipient is designated “high risk” by a federal grant making agency outside of the DOJ
15. Compliance with federal department grants financial guide
16. Encouragement of policies to ban text messaging while driving
17. Compliance with general appropriate law restrictions on the use of federal funds according to the fiscal year of award
18. Requirements related to “de minimis” indirect rate
19. Potential imposition of additional requirements
20. Employment eligibility verification for hiring under the award
 - a. The recipient (and any subrecipient at any tier) must:

- i. Ensure that, as part of the hiring process for any position within the US that is or will be funded (in whole or in part) with award funds, the recipient (or any subrecipient) properly verify the employment eligibility of the individual who is being hired, consistent with provisions of 8 USC 1324a(a)(1)
- ii. Notify all people associated with the recipient o(or sub-recipient) who are or will be involved in activities under this award or both
- iii. Provide training (to the extent necessary) to those people required by this condition to be notified of the award requirements for employment eligibility verification and of the associate provisions of 8 USC 1324a(a)(1)
- iv. As part of the recordkeeping for the award (including pursuit to the Part 200 Uniform Requirements), maintain records of all employment eligibility verifications pertinent to compliance with this award condition in accordance with Form I-9 record retention requirements, as well as records of all pertinent notifications and trainings

b. Monitoring

The recipient's monitoring responsibilities include monitoring of subrecipient compliance with this condition.

c. Allowable Costs

To the extent that such costs are not reimbursed under any other federal program, award funds may be obligated for the reasonable, necessary, and allocable costs (if any) of actions designed to ensure compliance with this condition

d. Rules of construction

- i. Staff involved in the hiring process
- ii. Employment eligibility confirmation with E-Verify
- iii. "United States" specifically includes the District of Columbia, Puerto Rico, Guam, the Virgin Islands
- iv. Nothing in this condition shall be understood to authorize or require any recipient, any subrecipient at any tier, or any person or other entity, to violate any federal law, including any applicable civil rights or nondiscrimination law

- v. Nothing in this condition, including in paragraph 4.B., shall be understood to relieve any recipient, any subrecipient at any tier, or any person or other entity, of any obligation otherwise imposed by law, including 8 USC 1324a(a)(1)

21. Restrictions and certifications regarding non-disclosure agreements and related matters

a. In accepting this award, the recipient –

1. Represents that it neither requires nor has required internal confidentiality agreements or statements from employees or contractors that currently prohibit or otherwise restrict employees or contractors from reporting waste, fraud, or abuse as described above; and
2. It certifies that, if it learns or is notified that any subrecipient, contractor, or subcontractor entity that receives funds under this award is or has been requiring its employees or contractors to execute agreements or statements that prohibit or otherwise restrict, reporting of waste, fraud, or abuse as described above, it will immediately stop any further obligations of award funds to or by that entity, will provide prompt written notification to the federal agency making this award, and will resume such obligations only if expressly authorized to do so by that agency

b. If the recipient does or is authorized under this award to make subawards, procurement contracts, or both –

i. It represents that –

1. It has been determined that no other entity that the recipient's application proposes may or will receive award funds either requires or has required internal confidentiality agreements or statements from employees or contractors that currently prohibit or otherwise restrict employees or contractors from reporting waste, fraud, or abuse as described above; and
2. It has made appropriate inquiry, or otherwise has an adequate factual basis, to support this representation; and

-
3. It certifies that, if it learns or is notified that any subrecipient, contractor, or subcontractor entity that receives funds under this award is or has been requiring its employees or contractors to execute agreements or statements that prohibit or otherwise restrict, reporting of waste, fraud, or abuse as described above, it will immediately stop any further obligations of award funds to or by that entity, will provide prompt written notification to the federal agency making this award, and will resume such obligations only if expressly authorized to do so by that agency
 22. Reclassification of various statutory provisions to a new Title 34 of the US Code
 23. Federal department training guide principles
 24. All subawards must have specific federal authorization
 25. Requirements related to System for Award Management and Universal Identifier Requirements
 26. Restrictions on "lobbying"
 27. Specific post-award approval required to use a noncompetitive approach in any procurement contract that would exceed \$250,000
 28. Requirements pertaining to prohibited conduct related to human trafficking
 29. Requirement to report potentially duplicative funding
 30. Reporting potential fraud, waste, and abuse, and similar misconduct
 31. The recipient understands that in accepting this award, the Authorized Representative declares and certifies, among other things, they possess the requisite legal authority to accept the award on behalf of the recipient entity and, in so doing, accepts all material requirements that relate to conduct throughout the period of performance under this award. The recipient further understands, and agrees, that it will not assign anyone to the role of Authorized Representative during the period of performance under the award without first ensuring that the individual has the requisite legal authority
 32. The recipient agrees to submit to the federal department for review and approval any curricula, training materials, proposed publications, reports, or any other written materials that will be published, including web-based materials and web site content, through funds from this grant at least 30 working days to targeted

dissemination date. Any written, visual, or audio publications, except for press releases, whether published at the grantee's or government's expense shall contain a statement provided by the federal department

33. The recipient agrees to comply with the federal agency's grant monitoring guidelines, protocols, and procedures, and to cooperate with the agency on all grant monitoring requests, including requests related to desk reviews, enhanced programmatic desk reviews, and/or site visits.
34. The recipient agrees to cooperate with any assessments, national evaluation efforts, or information or data collection requests, including, but not limited to, the provision of any information required for the assessment or evaluation of any activities within this project
35. Justification of consultant rate
36. Recipient understands and agrees that it must submit quarterly Federal Financial Reports (FFRs) (SF-425) and performance reports as required via the appropriate forum
37. The grantee agrees to comply with the applicable requirements of 28 C.F.R. Part 38, the regulation of governing "Equal Treatment for Faith Based Organizations (the Equal Treatment Regulation) stating that grant funds may not be used to fund any inherently religious activities, such as worship, religious instruction or proselytization
38. Limit on use of grant funds for grantees' employees' salaries
39. FFATA reporting: Subawards and executive compensation
40. Regarding medication-assisted treatment (MAT), the recipient understands and agrees to the following:
 - a. All clients in the funded drug court have the right to access MAT under the care and prescription of a physician to the extent MAT is clinically indicated
 - b. Drug courts must not deny any eligible client enrollment to the drug court program because of their use of FDA approved medications for treatment of substance abuse
 - c. MAT must be permitted to be continued for as long as the prescriber determines that the FDA approved medication is clinically beneficial
 - d. While under no circumstances can a funded drug court program deny access to MAT under the care and prescription of a physician when it is clinically indicated, a judge retains judicial

discretion to mitigate or reduce the risk or abuse, misuse, or diversion of these medications

e. Federal funds shall not be used to support activities that violate the Controlled Substances Act, 21 U.S. C 801-904

41. All adult drug courts must be operated based on the 10 key components for drug courts which are found in the National Association of Drug Court Professionals publication
42. The recipient understands and agrees that no award or matching funds may be used to provide services for violent offenders as defined in 42 U.S.C. 3797u-2
43. Recipient integrity and performance matters: Requirement to report information on certain civil, criminal, and administrative proceedings to SAM and FAPIIS
44. Recipient may not obligate, expend, or draw down funds until the awarding agency has reviewed and approved the Budget Narrative portion of the application and has issued an Award Condition Modification (ACM) informing the recipient of approval
45. Conditional Clearance
46. Recipient may not obligate, expend, or draw down funds until the awarding agency has reviewed and approved the Budget Narrative portion of the application and has issued an Award Condition Modification (ACM) releasing this award condition

3. OPERATIONAL

3.1 Execution

3.1.1 Grant Award Notification Procedures

All grant awards shall be reviewed by the Grants Manager, Procurement, CFO, and COO prior to requesting the BOC approval.

A) Requesting BOC Approval

Staff shall submit a copy of the Notice of Grant Award (NGA), and/or grantor contact, with a Request for Assignment of Grant Fund Number, Route slip for Contracts, Agreements, MOUs, and Agenda Item Summary Form to the Rockdale County Finance Department via interoffice mail to the GMD.

Grant awards requiring the Chair's signature will be completed as mandated thus requiring GMD assurance of appropriate timeframe for procedural review, approval, and preparation of resolutions that are necessary to appropriate and expend grant funds.

B) Grants Not Requiring the Chair's Signature

Grants not requiring the Chair's signature or external grants affecting county administration, and/or require a letter of support and/or matching funds should be routed to the GMD, Procurement, CFO, and COO prior to requesting the BOC approval.

3.1.2 Automated Clearing House (ACH) Enrollment Form

Banking information for county administration automated payments is on file with most federal and state agencies. However, an ACH enrollment form may be necessary. The form requires banking information including account numbers, routing numbers, and signature from the banking institution. If an ACH form is required, GMD should be contacted for assistance.

3.1.3 Purchasing

All grant-related equipment and services related to the execution of the grant should be conducted during the first quarter of the grant cycle and be subject to the Rockdale County Purchasing Department procurement guidelines.

Documentation of goods and services purchased with grant funds should reflect the process from beginning to end and should easily show efforts of competitive bidding when applicable. Documentation of purchases should include quotes or competitive bid, requisition, Purchase Order, Invoice including invoice number and clearly communicate the amount paid, and confirmation of payment.

NOTE: Some grant related purchases may require separate authorization from the grant agency before commencing the purchasing process. For those grants allowing or requiring the purchase of equipment or supplies, the program should affirm the ability to purchase with grant funds with the granting agency prior to purchase.

3.1.4 Request for Proposals

Rockdale County will issue a Request for Proposal (RFP) solicitation that is grant funded, department/official staff shall inform potential bidders through language of the RFP that the administration may not execute a grant funded subaward unless they have a valid Unique Entity ID (UEI) number on file.

County forms will require UEI Numbers to comply with the Federal Funding and Accountability Transparency Act (FFATA) as part of the New Vendor Package.

3.1.5 Grant Contracts and Reporting

All grant contracts shall be reviewed by the GMD, Procurement, CFO, and COO prior to requesting BOC approval.

- A) **Grant Contract Protocol:** Before department/officials can provide funds to a particular vendor, contractor, or sub-recipient, the following criteria must be met:

1. The grant program must authorize the distribution of funds, and
2. Departments/officials must have internal authorization from the GMD.

3.2 Record Keeping

3.2.1 Time and Effort Certification

Time and effort certifications are required from all grant fund county personnel. All grant personnel must complete the Grant Funded Employee Time Certification Form quarterly for each grant and reflect the percentage of time performed on each grant for said quarter. The certifications must be signed by the employee and their supervisor and submitted to the GMD. The GMD is responsible for reconciling time and effort to actual pay and making necessary adjustments.

3.2.2 Record Retention

Master grant files are to be maintained by GMD, departments/officials, and each sub-recipient. Having organized files allows grant documents to be quickly accessed upon request by the grantor, grantee or any authorized county staff member.

All grant award records are to be retained for a period of three (3) years or as stated in the grant agreement (whichever period is longer) from the date of submission of the project's final financial and performance report.

If any litigation, claim, or audit is started before the expiration of the (3) year period, grant records shall be retained until all litigation, claims, or audit findings have been resolved and final actions have been taken.

3.2.3 Acceptable Grant Files

The GMD and department/official staff, at a minimum, should retain the following information in the grant file:

- A) Grant application, project abstract, narrative, and budget.
- B) Grant award notification – contract or agreement.
- C) Resolution/exhibits approved by the BOC.
- D) Grant program policies and procedures designed to provide assurance to achieve the following:
 1. Effective and efficient operations.

2. Reliable financial reporting.
3. Compliance with applicable laws and regulations.
- E) Progress reports submitted.
- F) Financial reports submitted.

3.2.4 Indirect Costs

When indirect costs are included within the project budget from a federal grant, it will utilize one of the following rates:

- A) A negotiated rate per approved Negotiated Indirect Cost Rate Agreement (NICRA).
- B) In the absence of a NICRA, the de minis rate to be placed in effect will be determined at the time the federal award was issued. In the event it is determined to not charge a de minis rate as budgeted to the respective grant, GMD will submit appropriate documentation noting change in budget categories.
- C) A lower rate if required by the federal award authorizing legislation or other prevailing regulations.

The county will record indirect costs as revenue under the assigned coding for the federal award per its chart of accounts. Journal entries will be used to transfer recovered indirect funds to the county's general fund/operating account. For all grants, the GMD shall track expenditures and revenue separately for each grant for the purpose of routinely comparing actual costs to budget amounts at least on a quarterly basis. In the event a grant is not in accordance, GMD will meet with the respective grant program to rectify, establish a plan of action, and submit appropriate documentation.

* Current software utilized by the Rockdale County Finance Department does not provide the ability to track all necessities for managing budgets for grants management. Rockdale County is finalizing a Request for Proposal for a new software which includes the necessities for grant budgets. Upon installation of new budgeting software, GMD will amend the Policy and Procedures Manual to reflect expected changes.

3.2.5 Reconciliation

The GMD will, on the same cadence as each federal award's Federal Financial Report (FFR) process, reconcile General Ledger (GL) records for each grant against the FFR. The county will investigate and resolve any discrepancies or

document the prevailing circumstances if resolution cannot be completed immediately. A record of each reconciliation will be maintained in the grant file for the duration of the grant period of performance and record retention period. The county will make copies of the reconciliation(S) available to the federal awarding agency or other authorized entities upon request.

Matching funds, when required under federal awards, will be manually tracked by the GMD. Matching fund records will be included in the reconciliation process to ensure that:

- A) Match expenditures are accurately recorded in the GL.
- B) Matching requirements for each individual federal award have been satisfied; and
- C) The same expenditure is not claimed as match on multiple awards.
- D) To ensure FFRs are properly recorded and reconciled to the amounts recorded, all accounts should be analyzed, reviewed and reconciled timely and include sufficient detail to ensure balances are recorded and agree to subsidiary ledgers on a quarterly basis. In the event a grant is not in accordance, GMD will meet with the respective grant program to rectify, establish a plan of action, and submit appropriate documentation including adjusting the FFRs as necessary to reflect the actual cumulative amounts expended for said grant.

* Current software utilized by the Rockdale County Finance Department does not provide the ability to track all necessities for managing budgets for grants management. Rockdale County is finalizing a Request for Proposal for a new software which includes the necessities for grant budgets. Upon installation of new budgeting software, GMD will amend the Policy and Procedures Manual to reflect expected changes.

3.2.6 Match Documentation

GMD shall review all documentation for expenditures and revenue of grant programs to ensure FFRs noting "Match" funds are supported with the source and timing associated with the match amount and reconciled to the match amounts in the accounting system. In the event a grant is not in accordance with or provide supporting documentation, GMD will meet with the respective grant program to rectify and submit appropriate documentation in adjusting FFRs as necessary to reflect the accurate, supported amount for match.

3.2.7 Award Special Condition for Planning Grant Programs

GMD shall monitor and track separate expenditures for grant programs with special conditions i.e. planning grants. In the event the timeline and/or expenditures associated with planning coordination for the grant are not met and not approved by the granting agency, GMD shall meet with grant program to identify issues, barriers, new expectations, and budget requirements. GMD and grant program will communicate with granting agency administrators to identify appropriate plan of action, documentation to be submitted, and restrict future spending until GMD receives notification approving plan of action and extension of time and budget for completion of planning process and approval.

3.3 Reports

3.3.1 GMD staff is responsible for ensuring that all programmatic program reports are completed and submitted on time per the grant guidelines. The GMD is responsible for ensuring that all fiscal program reports are completed and submitted by grant guidelines.

3.3.2 A copy of all quarterly, semi-annual, annual, and close-out reports pertaining to a grant's progress, performance, financial or close-out shall be forwarded to the GMD at the same time they are submitted to the grantor agency. The communication is to include department/official name, staff contact name and information, grant program title, and the county fund number that is associated with the grant program. The GMD shall maintain a file of all reports.

3.3.3 Types of Reports

- A) Performance:** Departments/officials are required to regularly submit and retain performance reports that reflect grant funded operational progress as required by the grant.
- B) Financial:** The GMD is required to regularly submit and retain financial reports that reflect a project's fiscal health as required by the grant. Invoices are expected to be submitted no more than monthly and no less than semi-annually unless otherwise noted by the grant.
- C) Close-out:** Close-out documentation should be provided by the grantor, department/official staff are responsible for showing the project's grant budget balances with GMD financial records and any discrepancies are noted in the grant files.

4. COMPLIANCE

4.1 Purpose of Compliance

The purpose of grant compliance is to promote orderly grant operations, ensuring that quality services are consistent with the grant's mission and objectives and that grant funds are used according to the project's approved application, scope of services, budget, subawards, and all other legal requirements that are associated with the grant.

4.2 Internal Oversight

It is the county's duty to safeguard grant funds against loss due to waste, abuse, mismanagement, errors, and fraud. The GMD works to promote adherence to laws, statutes, regulations, contracts, grant agreements, policies and procedures that govern county grants. Components of an internal control environment include:

- A) Risk Assessment,
- B) Control Activities,
- C) Information and Communication, and
- D) Evaluations.

Effective grant control environments consist of staff that understand their roles and responsibilities, limits to their authority, and are committed to performing tasks in a correct and timely manner.

4.3 Grant Governance

The grant environment governs how business is conducted. The type of grant determines the program and public policy laws, administrative, cost principles and audit requirements that are to be followed. Below is the standard hierarchy of grant governing authorities for federal grants.

All legal authorities for which the grantee or subgrantee is bound to through the grant agreement must be upheld. Therefore, it is essential to understand the legal governing of each grantor agency so that the department/official staff and their sub-recipients comply.

The county must comply with all relevant statutes passed by federal, state, or local governments if they are not contradictory. When contradictory, the statute authorizing the grant program shall supersede and the grant's program manager shall be notified to confirm the accuracy of the decision.

4.3.1 Governing Authorities for Federal Grants

Direct federal grants are those in which the U.S. Government is the agency granting funds to Rockdale County government. In this scenario, the county is considered the grantee or pass-through agency.

- A) **Grant Program Guidelines/ Catalog of Federal Domestic Assistance (CFDA):** The online CFDA provides access to a database of all federal programs available to state and local governments. The CFCA is a government-wide compendium of federal programs, projects, services, and activities that help or benefit the public. It contains financial and non-financial assistance programs administered by departments and, but establishments of the federal government.

The primary purpose of the CFDA is to obtain general information on federal assistance programs and improve coordination and communication between the federal government and state and local governments. Programs selected for inclusion in the federal assistance data base are defined as any function of a federal agency that aids or benefits for state or states, territorial possession, county, city, other political subdivisions, grouping or instrumentality thereof, any domestic profit or nonprofit corporation, institution, or individual, other than an agency of the federal government.

Assurances, program compliances, and executive orders that specifically govern a grant program are also to be considered governing program guidelines.

- B) **Code of Federal Regulations (CFR):** The CFR such as CFR and OMB guidance that applies to the grant program, including uniform administrative requirements, cost principles, and audit.

4.3.2 Governing Authorities for State Grants

A grant that is funded by the U.S. government that passes through the State of Georgia to Rockdale County is not a direct federal grant but considered a federal through state grant and should adhere to state grant guidelines.

4.4 Grant Evaluations

A grant evaluation is the assessment of internal control performance over time. The purpose of evaluating is to reveal if internal controls are adequately designed, effective, and properly executed in the form of a process evaluation. Evaluation will also conduct observations of a project's outcome data as it relates to the proposed goals and objectives to determine the impact of the project and assure allocated funding was utilized for proposed purposes.

Rockdale County has a third-party evaluator on contract to assist with grant proposals requiring a description of evaluation methods, assist in the coordination for development any required strategic planning activities, assist with required program reporting, and complete required evaluation. The current contracted provider is Marchman Consulting and GMD will coordinate availability of services. In the event, the program developing a grant proposal identifies the need for another evaluation service due to potential specialty required, the program will meet with the GMD to discuss the need and ensure the proposed evaluator meets expected standards.

4.4.1 Subrecipient Monitoring

It is the department's/official's responsibility to monitor subrecipients, ensuring that the subrecipient follows all applicable federal regulations and program terms and conditions based on the grant agreement. The GMD will guide and assist departments in monitoring subrecipients for compliance areas including, but not limited to:

- A) Establish a subaward agreement in compliance with requirements of Title 2 CFR 200.332 and maintain file.
- B) Reconciliation of subrecipients' claimed expenditures vs supporting documentation (e.g. GL, payroll register, invoices, cancelled checks, bank statements, etc.),
- C) Confirmation of subrecipients' satisfaction of match requirements,
- D) Accounting for subrecipients' program income, and
- E) Subrecipients' completion and submission of single audit or program-specific audits when expenditures meet the prevailing threshold from 2 CFR § 200.501.

It is the department/official's responsibility to monitor subrecipients, ensuring that the agency complies based on the grant agreement. The GMD will guide and assist departments in monitoring subrecipients.

4.4.2 Desk Evaluations

Grant evaluations may be conducted by the grantor through the desk of county staff or on-site where the program is administered. Desk evaluations are generally conducted for efficient purposes, with a site visit to follow the initial assessment of data and documentation if it is determined that a site visit is warranted.

The steps in a desk evaluation may include:

- A) Researching any subrecipients, the program and the project,
- B) Collecting information and documentation,

- C) Analyzing documentation, and
- D) Reporting the results and notifying the county and other appropriate agents.

4.4.3 Site Visits

Site visits may be random or mandate of the granting agency and agreed guidelines to provide an opportunity to assess grant programs, ensure that proper systems are in place to meet requirements and objectives of the proposed grant purpose proposed and provide opportunity to seek and receive operational feedback from the observer(s).

4.4.4 Evaluation Document

The following documents may be requested for a grant evaluation or site visit but are not limited:

- A) Grant program files,
- B) Governing regulations,
- C) Financial and progress reports and supporting information,
- D) Audits,
- E) Grant staff and subrecipient's policies and procedures, and
- F) Proposed agenda for meetings and attendees for the duration of the site visit.

4.5 Technical Assistance

The GMD will provide technical assistance for any related compliance matter, provided that responsible notice is given requesting such assistance. The GMD will also provide guidance to the project to discover and/or contact Technical Assistance and Trainers (TTAs) associated with the granting agency and program.

4.6 Occurrences Requiring GMD to be Notified Immediately

4.6.1 Key Personnel Changes

The GMD shall be notified immediately by the department/official staff or agency upon the resignation, termination, promotion, or retirement of any grant liaison or other key grant program staff member to ensure that proper retention of information and continuous grants management occurs during the transition period.

4.6.2 Notice of Audit, Monitoring Visit, or Review

The GMD shall immediately be notified upon receipt of a notice by a department/official of a site or monitoring visit to be performed by the grantor funding agency. GMD will guide in the preparation of grantor site visits, reviews, or audits.

4.6.3 Grant Misconduct

Waste, fraud, abuse, misconduct or any other serious deviation from acceptable grant practices when proposing, carrying out, or reporting activities or results that involve a grant is considered grant misconduct. Any form of grant misconduct or potential misconduct shall be reported to the GMD within 24 hours. Upon contact, GMD will take a report and subsequently work with the department/official to ensure proper investigative and notification procedures are implemented.

5. GENERAL GRANT REGULATIONS

5.1 UEI Number Requirements

The federal government requires that all applicants for federal grants, cooperative agreements, and subawards, except for individuals other than sole proprietors, have a UEI number to better identify organizations that are receiving funding under grants and cooperative agreements, and to provide consistent name and address data for electronic grant application systems.

On April 4, 2022, the federal government stopped using the DUNS Number to uniquely identify entities. Now, entities doing business with the federal government use the UEI created in SAM.gov. Entities are no longer required to use a third-party website to obtain their identifier. This transition allows the government to streamline the entity identification and validation process, making it easier and less burdensome for entities to do business with the federal government (gsa.gov).

5.2 Debarment and Suspension

Rockdale County government and its subrecipients shall not award grant assistance to applicants that are debarred or suspended or otherwise excluded from or ineligible for participation in federal assistance programs.

County departments/officials and subrecipients are to ensure the potential subaward agency or its principals are not presently debarred, suspended, proposed for debarment, declared ineligible, or voluntarily excluded by any federal department or agency. At a minimum, the department/official, county subgrantees, and GDM will check the Excluded Parties List System (EPLS) at www.epls.gov to ensure that the agency itself or principals of the subaward agency are not excluded or disqualified based on the EPLS.

5.3 Federal Funding Accountability and Transparency Act (FFATA)

FFATA reporting is required whenever a first-tier federal subaward is issued for \$30,000 or more. The GMD will enter the information through the federal reporting system (SAM.gov) for all applicable subaward obligations no later than the 20th of each month following the month that the subaward was executed.

An agreement may be classified by the county as a subaward based on the presence of any of the following five (5) characteristics:

- A) May determine who is eligible to receive what federal financial assistance.
- B) Has its performance measured against whether the objectives of the federal program are met,
- C) Has responsibility for programmatic decision making,
- D) Has responsibility for adherence to applicable federal program compliance requirements, and
- E) Implements a program for public purposes specified in authorizing statute, as opposed to providing goods or services for the benefit of the pass-through entity.

NOTE: FFATA reporting does not apply to the general procurement of goods or services.

5.4 Code of Federal Regulations and Office of Management and Budget Circulars

5.4.1 Uniform Administrative Requirements

- A) **OMB Circular A-102:** This OMB grants guidance is for grants and cooperative agreements with state and local governments. This guidance is to serve as administrative guidance to Rockdale County government, including all county departments/officials in their capacity as a direct federal grantee unless the grant program guidance states otherwise.
- B) **2 CFR Part 215 (formerly OMB Circular A-110):** This OMB grants guidance is for grants and agreements with Institution of Higher Education, Hospitals, and Other Non-Profit Organizations. This guidance is to serve as administrative guidance to Rockdale County government's subrecipients that are higher education, hospital, or non-profit agencies, unless the grant program guidance states otherwise.

5.4.2 Cost Principles

2 CFR Part 225 (formerly known as OMB Circular A-87) provides guidance for Cost, Principles for State, Local, and Indian Tribal governments. This guidance is to serve as cost principles guidance for Rockdale County government unless the grant program's guidance state otherwise.

5.4.3 Audit Requirements

When the county expends \$1,000,000 or more in federal award funds during a fiscal year, it will complete a single audit or program-specific audit in accordance with the provisions of 2 CFR § 200.501. The county will submit the audit to the Federal Audit Clearinghouse (FTC) within 30 calendar days after receipt from the auditor or nine months after the end of the audit period (whichever is earlier).

5.5 Equal Service Provider

Rockdale County is an equal employment and services provider. All grant decisions are based on merit and program need, and not on race, color, citizenship status, national origin, ancestry, gender, sexual orientation, age, weight, religion, creed, physical or mental disability, marital status, veteran status, political affiliation or any other factor protected by law.

County departments/officials shall also adhere to the National Policy Requirements affecting grants. Samples of these policies are named below. It is also the responsibility of county departments/officials to ensure that subgrantees adhere to these applicable policies.

5.5.1 Title VI

Title VI of the Civil Rights Act of 1964, 42 U.S. C. 2000d, et seq. and its implementing regulations provide that no person shall be subjected to discrimination on the basis of race, color, or national origin under any program or activity that receives federal financial assistance. In most cases, when a recipient receives federal financial assistance for a particular program or activity, all operations of the recipient are covered by Title VI, not just part of the program that uses the federal assistance.

5.5.2 Limited English Proficiency (LEP)

Language for LEP individuals can be a barrier to accessing important benefits or services, understanding and exercising important rights, complying with applicable responsibilities, or understanding other information provided by federally funded programs and activities. Title VI and Title VI regulations require that recipients take reason steps to ensure meaningful access to the information, programs, and services they provide.

5.5.3 Americans with Disabilities Act (ADA)

In the broadest sense, it requires that state and local governments be accessible to people with disabilities. Additional information regarding statutes and regulations can be found at <http://www.ada.gov/>.

5.5.4 Other National Policies – Miscellaneous

Age Discrimination Act, Section 504 of the Rehabilitation Act, Fair Labor Standards Act, Davis-Bacon Act, Contract Work Hours and Safety Standards Act, Anti-Kickback (Copeland) Act, Lobbying Restrictions, Debarment and Suspension, Freedom of Information Act, Drug-Free Workplace Act, and more.

The following *generally relate to construction grants*: National Environmental Policy Act, Federal Water Pollution Control Act, Clean Air Act, National Historic Preservation Act, Davis-Bacon Act, Contract Work Hours and Safety Standards Act, and more.

6. GRANT RELATED FORMS

Rockdale County BOC provides certain grant-related forms to be used by staff when routing grant awards for signature, executing subawards/subcontracts, documenting grant staff time, etc.

Forms referred to are listed below and are provided on the Rockdale County Intranet under the GMD webpage entitled Grant Resource Forms.

- A) Budget Summary Form
- B) Special Terms and Conditions Certification Form
- C) Grant Funded Employee Time Certification Form
- D) Route Slip for Contracts, Agreements, and MOUs
- E) Agenda Item Summary Form

7. APPENDICES

7.1 Glossary

Abstract: An overview and summary statement provided by the subrecipient describing a grant's purpose, target population, goals and objectives. Typically, an abstract is limited to one page or limited word count.

Activities: A logic model component that describes what a program does with the inputs to fulfill its mission. Activities include the strategies, techniques, and types of treatment that comprise a program's service and methodology.

Award: Financial assistance to support and accomplish a public purpose. Awards include grants and other agreements in the form of money, property, or technical assistance in lieu of money, by the grantor to an eligible recipient. The term does not include technical assistance, which provides services instead of money; other assistance in the form of loans, and contracts which are required to be entered into and administered under procurement laws and regulations.

Budget: A budget is an estimation of revenue, expenses, or changes in finances over a specified future period.

Budget Narrative: A detailed justification for every dollar requested, demonstrating a clear understanding of project needs and responsible resource allocation. This narrative bridges the gap between the budget spreadsheet and the project description, ensuring alignment and reinforcing the project's feasibility. It assures the funding agency that the applicant has a well-defined plan for utilizing funds effectively and achieving project objectives.

Cash Match: Includes actual cash spent by the subrecipient for project-related costs. Accounting records should be verifiable and trace back to source documentation.

Contracts: Written agreements entered by the awarding agency, recipients or subrecipients, and commercial (profit-making) and non-profit organizations. Except for a few justified sole source situations, contracts are awarded via competitive processes to procure a good or service.

UEI Number: Unique Entity Identifier is a 12-character number assigned to all entities (public and private companies, individuals, institutions, or organizations) who must register to do business with the federal government in SAM.

Evaluation: Grant evaluation is the systematic process of assessing a grant-funded project. This evaluation helps you determine if the project achieves its intended outcomes. It involves collecting and analyzing data to gauge performance.

Equipment: Tangible non-expendable personal property having an acquisition cost of \$5,000 or more per unit. A subrecipient may use its own definition of equipment provided that such definition would at least include all equipment defined as above.

Grant: Agreement of financial support from an agency to a recipient to carry out a public purpose of support or provide whenever 1) the principal purpose of the relationship is the transfer of money, property, services, or anything of value to the recipient in order to accomplish a public purpose of support or purpose

authorized by statute; and 2) no substantial involvement is anticipated between the granting agency and the recipient during performance of the contemplated activity.

Grant Award Process: The grant process follows a linear life cycle that includes creating funding opportunities, applying, making award decisions, and successfully implementing the award. The specific actions along the lifecycle are grouped into three main phases: Pre-Award Phase, Award Phase, and Post-Award Phase.

Grant Management Department: The Grants Management Department (GMD) serves Rockdale County government departments and officials with grant-related practices from within the Finance Department.

Grantor: Primary awarding agency, i.e. federal or state government, non-profit, foundation, etc.

Grantee: The direct recipient of a grant award who is legally bound by the grantor's award or contract.

In-Kind Match: A form of budget match that is not defined as cash. In-kind is the value without any exchange of cash. In-kind contributions must be verifiable from grantee records, necessary and reasonable, allowable under cost principles, and not included as a contribution under any other federal award.

Input: A component of a logic model/strategic plan including resources dedicated to or consumed by a program such as money, staff and staff time, facilities, equipment and supplies.

Logic Model: A methodology for how the project theoretically seeks to benefit the target group. The narrative description of the applicant's project must tie purposes, inputs, activities, outputs, and outcomes together in a logical fashion.

Match: The subrecipient share of the project cost. Match is restricted to the same use of funds as allowed for the federal funds. Match must be directly related to the project goals and objectives and must be documented in the same manner as grant funded activities. See cash match and in-kind match.

Non-Profit Organization: Refers to those legally constituted, non-governmental entities, incorporated under state law as charitable or not-for-profit corporations that have been set up to serve some public purpose and are tax-exempt according to the IRS.

Obligation: A legal liability to pay under a grant, subgrant, and/or contract an agreed upon sum for services or goods incurred during the grant term.

Outcomes: A component of a logic model/strategic plan describing the benefits resulting in the proposed program activities. Outcomes should describe some change in the participant's condition. The key is to show what differences a project is expected to make or what value it is expected to add to the participant's well-being. Outcomes establish the benefits of the funding in measurable terms for services being provided.

Output: A component of a logic model/strategic plan describing the direct product(s) of program activities and usually are measured in terms of the volume of work accomplished such as the number of classes taught, counseling sessions provided, participants served, etc.

Pass-Through Entity: A non-grantee entity providing an award to a subrecipient to carry out a grant program.

Personally Identifying: Identifying information for or about an individual including information likely to disclose the location of a victim of domestic violence, dating violence, sexual assault, or stalking, includes:

- A) First and last name,
- B) Home or physical address,
- C) Contact information (including a postal, e-mail or internet protocol address, or telephone number),
- D) Social security number, and
- E) Any other information, including date of birth, racial or ethnic background, immigration status, religious affiliation, that, in combination with what is listed above, would serve to identify any individual.

Program Income: Gross income earned by the recipient during the funding period as a direct result of the award.

SAM: SAM.gov is the official website of the U.S. government for contracting and award management.

SMART Goals: S.M.A.R.T. (specific, measurable, achievable, relevant and time-bound) goals can help all project managers create clearly defined mission objectives that can help ensure success.

Site Visit: An inspection by granting agency of the site where services are to be performed and to satisfy themselves regarding all general and local conditions that may affect the cost of contract performance, to the extent that the information is reasonably obtainable. In no event shall failure to inspect the site constitute grounds for a claim after contract award.

Subrecipient: The legal entity to which a subaward is made and which is accountable to the recipient for the use of the funds provided. Subrecipient and sub-awardee are interchangeable terms.

Subaward: An award of financial assistance, generally a monetary award, made because of a federal award to a grant recipient or contractor to a sub-recipient or sub-contractor respectively.

Subgrant: An award for financial assistance made under a grant by a grantee to an eligible subgrantee. The term includes financial assistance when provided by contractual legal agreement, but does not include procurement purchases, nor does it include any form of assistance which is excluded from the definition of a grant in this part.

Subgrantee: The legal entity receives a subgrant award and is accountable to the grantee for the use of the funds provided.

Supplantation: Supplanting occurs when an entity replaces funds for an activity because federal funds are available (or are expected to be available) to fund that same activity. Most federal funding specifically prohibits supplanting, and in general, it is considered the best practice.

Strategic Plan: a process to define its future direction and makes decisions such as resource allocation aimed at achieving its intended goals. Strategies have many definitions, but they generally involve setting major goals, determining actions to achieve these goals, setting a timeline and mobilizing resources to execute the actions. A strategy describes how the ends (goals) will be achieved by the means (resources) in each span of time. Often, strategic planning is long term and organizational action steps are established from two to five years in the future.

8. BOARD OF COMMISSIONERS APPROVAL

Approved this 28 day of January, 2026.

ROCKDALE COUNTY, GEORGIA

BOARD OF COMMISSIONERS

By: JaNice Van Ness
JaNice VanNess, Chair

Attest:

By: Jennifer Rutledge

Jennifer Rutledge, County Clerk



Board of Commissioners
Agenda Item Transmittal Form
Policy Transmittal Form

RATIFICATION

Type of Request:

County Clerk Use Only

Policy #: 2016-1-22, As Amended

☐ Submission Information

Contact Name: Austin Jackson

Department: Finance

☐ Information

Policy 2016-1-22, As Amended

Rockdale County, Georgia Grants Management Policy
Manual

2/12/26

Notes and Comments:

Rockdale County, Georgia Grants Management Policy Manual – Ratification