

GATEWAY WATER MANAGEMENT AUTHORITY POLICY and PROCEDURES

GRANTS

As a service to its members, GWMA seeks grants for regional projects to enhance opportunities at a lower cost. GWMA has developed this guidance document to assist the board and staff in identifying and applying for watershed-related grants. By using the outlined provisions, GWMA can evaluate the cost-benefit and competitiveness for each grant opportunity and make recommendations thereof for securing and managing the grants.

A. CONCEPTS AND FRAMEWORK

1. GWMA to fund application development and submission costs:
 - a) No minimum or maximum application cost, but must meet the following:
 - i. Single project with multiple benefits and indirect or direct benefit to the region; or
 - ii. Single project with specific, multiple beneficiaries; or
 - iii. On a case by case basis, GWMA Board may consider funding other grant applications if project is a priority and has special circumstances.
2. Criteria for Grant Applications
 - a) Implementation Grants - \$1M minimum total project cost per regional application (i.e. 5 sub-projects at \$200k each);
 - b) Planning Grants – No minimum project cost per regional application;
 - c) If project is mandated by a regulatory agency, seek all grants without consideration of minimum match; and
 - d) If project is not mandated by a regulatory agency, seek grants with no more than 60% local match required.
3. GWMA will consider, on a case-by-case basis, using its own funds for Feasibility Studies and/or Planning to assist with multi-party project development.
4. GWMA Terms and Sub-Recipient Agreements
 - a) GWMA will only support projects with executed sub-recipient agreements that transfer grant responsibilities to sub-recipient;
 - b) GWMA Administrative Costs are defined as administrative, project management, and technical costs in support of a project;
 - c) GWMA Administrative Costs must be mutually agreed upon and included in total project costs;
 - d) Mutually agreed upon GWMA Administrative Costs must be paid and shared proportionately by grant beneficiaries and/or fully reimbursed by the grant;
 - e) GWMA with board approval, may consider entering into consultant and/or construction contracts on behalf of a multi-party project if 100% of the funds are collected prior to contract/agreement execution; and
 - f) GWMA will not “front” direct project costs on behalf of beneficiaries regardless of grant reimbursement policies or schedules.

B. Internal Controls

1. Having a system of internal controls is a process, implemented by a non-Federal entity, designed to provide reasonable assurance regarding the achievement of objectives in the following categories:

- (a) Effectiveness and efficiency of operations;
 - (b) Reliability of reporting for internal and external use; and
 - (c) Compliance with applicable laws and regulations;
 - (d) Ensure high ethical standards are maintained.
2. Responsibilities for each level of internal controls are as follows:
- a) GWMA Board
 - 1. Approves grant policies and procedures;
 - 2. Approves all grant applications and grant agreements;
 - 3. Delegates contract execution to Chair; and
 - 4. Delegates signature authority to Executive Officer for grant administration.
 - 3. Executive Officer
 - a) Reviews grants and executes related documents when authorized by GWMA Board;
 - b) Develops recommends and maintains grant management policies;
 - c) Manages Project Managers and GWMA staff working on grant;
 - d) Responsible for compliance with the specific terms of each grant; and
 - e) Provide status reports for each project/grant to the GWMA Board.
 - 4. Grant Coordinator/Manager
 - a) Grant Coordinator/Manager "GCM" to develop a system, approved by the Executive Officer and the GWMA's Independent CPA that tracks grants, sub-recipients, projects, budgets and grant requirements.
 - 1. GCM to communicate in a consistent manner with sub-recipients, project managers and/or staff regarding requirements, due dates, project/grant status, procurement requirements, budgets, etc.
 - 2. GCM will develop a shareable spreadsheet that identifies the Grant Name/No., Sub-Recipient Contacts and Information, Deliverables, Due Dates, Grant Amount and Grant Match, Backup and Supporting Documentation Received and Approved, and any other pertinent information relative to the specific grant. The spreadsheet will also include labels for required all approvals before submission to granting agency.
 - 3. The spreadsheet will be updated at a minimum monthly. If no update is required due to non-activity, the spreadsheet will indicate as such.
 - 4. The spreadsheet will be updated after receiving written information, and/or backup and supporting documentation which is compiled and received from sub-recipient and/or Project Manager.
 - 5. The documentation will be reviewed by the Grant Coordinator/Manager, Accounting and/or Administrative Assistant, the Executive Officer and GWMA's Independent CPA prior to updating the spreadsheet with an approval confirmation.
 - 6. It is the responsibility of the GCM to ensure all approvals are documented on the spreadsheet.
 - 7. Develop and maintain grant/project records.

5. Accounting Assistant

- a) Accounting Assistant will review invoices and the supporting documentation to ensure detail is included and supported per the requirements of the specific grant
 - 1. Each invoice will be cross-checked to make sure it is eligible for cost match and/or grant reimbursement.
 - 2. Receive invoice approvals prior to payment from Executive Officer, Chair, Treasurer and Board.
 - 3. Will cross-check grant-specific invoice reimbursement forms with associated progress report to ensure activities coincide with costs.
 - 4. Enter invoices paid by GWMA into accounting system by task level identified by the specific grant.
 - 5. Enter invoice reimbursement as a receivable into the GWMA accounting system
 - 6. Coordinate on-site management reviews by the grantor agency;
 - 7. Monitor grant expenditures and receipt of revenues;
 - 8. Ensure compliance of grant requirements and Single Audit Act requirements;
 - 9. Coordinate preparation and distribution of single audit reports; and
 - 10. Work with Independent CPA to resolve any audit findings.

6. Project Manager

- a) Sub-recipients may serve as the Project Manager for any individual and/or multi-party grant. As such, they will be required to execute a sub-recipient agreement which identifies their responsibility as the Project Manager and follow the grant requirements and coordinate with GWMA for deliverables and requests per grant guidelines.
- b) GWMA will retain a Project Manager to manage and coordinate multi-party projects when needed.
- c) Project Manager responsibilities are as follows:
 - 1. Review specific grant requirements;
 - 2. Follow procurement requirements;
 - 3. Provide status reports to GWMA as requested;
 - 4. Coordinate project activities, budget, schedule, procurement, etc.;
 - 5. Collect invoices, POs, contracts, payroll records, other supporting documentation, and cross-check, and submit with required claim form to GWMA as required by grant;
 - 6. Prepare Progress Report as required by grant; and
 - 7. Communicate with GWMA on regular basis

C. Single Audit Act Requirements

- 1. For federal grants, GWMA is subject to the financial and compliance requirements of the 2 CFR 200 which is applicable to all local and state governments expending more than \$750,000 in federal financial assistance during a fiscal year. The purpose is to:
 - a) Improve the financial management and accountability of state and local governments with respect to federal financial assistance programs;
 - b) Establish uniform requirement for audits of federal grants;
 - c) Promote efficient and effective use of audit resources; and
 - d) Assure that federal departments and agencies rely upon and use audit work performed during a single audit rather than performing the audit work themselves.
- 2. For federal grants, regardless of expending the minimum threshold of \$750,000, GWMA's policy is for all financial and project compliance to meet the requirements of a single audit.

- D.** Changes to this policy may be made by a majority vote of the GWMA Board at any time.