



# **GRANT MANAGEMENT MANUAL**

***UNDERSTANDING THE GRANT MANAGEMENT PROCESS IN THE SEATTLE  
POLICE DEPARTMENT FROM APPLICATION TO FINAL REPORT***

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## **A. INTRODUCTION**

The purpose of this manual is to provide an overview of the grant application and management process, answer some common questions about grants and explain, in general, how the process works from initial solicitation review, application and managing the grant/project to completion. Additional information and detailed materials are available by contacting the following Grants & Contracts Unit (GCU) staff:

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## **B. OVERVIEW: UNDERSTANDING GRANTS AND HOW THEY WORK**

SPD grant awards traditionally come from either the U. S. Department of Justice (**DOJ**) or the **U.S. Department of Homeland Security (HLS) through the Federal Emergency Management Agency (FEMA)**. The DOJ is headed by the Attorney General of the United States and is comprised of many offices and bureaus, including the Office of Justice Programs (**OJP**) and the sister agency Community Oriented Policing Services Office (**COPS**). Within OJP, the Bureau of Justice Assistance (**BJA**), the National Institute of Justice (**NIJ**) (i.e., DOJ's research arm), the Office for Juvenile Justice Delinquency & Prevention (**OJJDP**), (which administers Internet Crimes Against Children (**ICAC**)), and the Juvenile Accountability Incentive Block Grant (**JAIBG**), are among the many bureaus, offices and programs that support law enforcement through grant programs. In particular, the COPS Office oversees grant programs in a myriad of local and national community policing projects and programs currently ongoing.

HLS is also a large federal agency and FEMA is one of many departments within its organizational structure. FEMA is responsible for the administration of the **Port Security Grant Program (PSGP)** and the **Homeland Security Grant Program (HSGP)**. HSGP is an umbrella grant, meaning that it encompasses several grant programs, specifically the **State Homeland Security Grant Program (SHSP)**, and the **Urban Area Security Initiative (UASI)**.

Typically, grants are financial awards that support federal initiatives for projects, equipment, or staffing assistance. Grant initiatives can begin at the "grassroots" level in response to community concerns evolving through the legislative process or directly from Congress to address/solve a national priority. The federal grant process usually begins with a solicitation from the federal grantor. SPD is currently on listservs for several agencies and receives a Competitive Grant Announcement or solicitation notices which details the specifics about: grant funding availability, eligibility requirements and specific instructions on how to apply for the opportunity.

The type of project and how the money can be used is determined by the federal agency, and detailed in the solicitation and grant guidance. For the most part, grants are intended to encourage local recipients to start new and/or innovative projects. Typically, federal grants do **not** fund normal operating

expenditures; however, there are some special projects, such as police staff hiring or equipment acquisition initiatives, that receive grant funding, e.g., through various COPS Office initiatives.

Grant awards specify a set amount of time that the grantee has to complete the project and fully spend the awarded funds. Typically, the term ranges between 1 to 3 years, depending on the project. If more time is needed, a no-cost time extension, (i.e., where no additional funding is needed) can be requested and is usually approved, if reasonable.

Some grant projects require the grantee commit to a contribution of its own resources in order to leverage the federal funding. This is known as match dollars. The amount required is based on a percentage of the award, calculated using federal cash match formulas and techniques. In some grant solicitations, the match requirements can be met by using an "in kind" match; which means that the cost of the time, facilities and/or equipment provided by SPD may be applied as the local match or "contribution" toward the overall project. Other times the solicitation may require a cash contribution, or a combination of both.

Match dollars, whether cash or in-kind, cannot be from any federal source. They must be from SPD or City resources, from partner agencies, or donations. When identifying in-kind match sources for the grant application it is important to select only those in-kind match activities that directly relate to the project. The in-kind match should in some way meet the objectives of the project or enhance the project. The anticipated in-kind match must be detailed in the application budget and budget narrative by cost category. If additional match is identified after the budget is approved, but the funds are from a cost category not identified in the budget, a budget grant adjustment notice must be submitted and approved before the match dollars can be tied to the project.

There are several different types of grant solicitations: competitive, formula and cooperative agreements. Competitive grants are applied for by SPD after locating a grant that aligns with SPD's Strategic Plan. These grants are extremely difficult to obtain as they are nationally competitive solicitations and have limited funding.

HLS grants tend to be formula grants, meaning the recipient receives a specific allocation based on where they place nationally in the areas of population and threat. Once the award amount is determined the Policy Groups from Homeland Security Region 6 and the Urban Area submit them to the State. The projects are submitted as Investment Justifications to FEMA in the grant application. There are several formula grants through the BJA and typically utilize crime rates and population census to determine allocations; for example, Edward Byrne Justice Assistance Grant.

Cooperative agreements are a combination of competitive and formula grants. An application is required and the allocation is subject to adjustment each year; even though the grant period is three years. This type of grant allows the federal program manager take a larger role in the design and implementation of the project. Cooperative agreements are entered into when SPD is meeting the goals and working on national level to help achieve the national goals of OJJDP, for ICAC, or other departments.

All federal and state grant awards received by SPD must be used to leverage existing funds for project activities and not replace, or "supplant", those funds that have been appropriated for the same purpose.

Supplanting is strictly forbidden by federal regulations. This means that the funds need to pay for services, equipment or projects that are “over and above” what is already budgeted. As mentioned previously, federal grantors expect awarded funds to be used within a specific scheduled time period. Federal grant program initiatives often intend to address specific problems. The recipients of grant funds have responsibility to track the use of the funding and maintain records of the project’s expenditures, project progress, and success meeting deliverables and grant requirements. Progress reports are required and the Grantor conducts periodic site monitoring visits to review progress. Financial audits are also conducted to ensure sound financial management systems and controls are in place to adequately manage the grant funding.

Finally, there is frequently inadequate time to coordinate and develop a grant proposal, get all required approvals, and write a competitive grant application within the time allowed. A typical time frame is about three to five weeks from the time Unit staff reviews the solicitation until it is due to the federal agency. Very seldom are these deadlines extended, so it is critical that Grants & Contracts Unit’s main focus be to gather all the components of the grant application from the Subject Matter Experts (SME) and make sure it is submitted on time.

Grant applications are highly competitive and time sensitive. As a Grant manager, it is vital that you keep on top of numerous solicitations that are available, have a strong understanding of the Seattle Police Department’s programmatic and budgetary needs and constantly be aware of when grants are available and how or if they meet the needs of SPD. Grant applications are a time sensitive and highly detailed endeavor. As a grant manager, you will need to work closely with the Subject Matter Experts (SME) who will be managing the project.

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## **C. THE VARIOUS & SUNDRY GRANT FUNDING STREAMS**

### **C-1 TYPES**

#### **FORMULA (OR BLOCK)**

- Awarded to State and local governments based on a predetermined formula; often based on a jurisdiction's crime rate, population, risk, or other factors.
- Awarded to an agency designated by a federal agency.
- Generally, requires States to pass awards to local agencies and organizations via sub grants.

#### **DISCRETIONARY**

- Awarded on a competitive basis to public and private nonprofit organizations.
- Funding ranges from single awards for research, evaluation, and technical assistance to multi-site awards for project development.
- Awarded on a competitive basis, consistent with congressional earmarks, to discretionary projects.

- Spending is strictly managed within specific categories within very specific, non-negotiable outcomes prescribed in detail in the grant application or grant guidance.
- The federal review process gives the funding agency “discretion” to determine which proposals/applications best address the project solicitation requirements Non-Discretionary
- Awarded on a competitive basis to public and private nonprofit organizations.
- Funding ranges from single awards for research, evaluation, and technical assistance to multi-site awards for project development.
- Awarded on a competitive basis, consistent with congressional earmarks, to certain non-discretionary programs.
- Spending is broadly managed within general categories.

### **CONGRESSIONAL EARMARKS**

- Hard Earmarks: Congress directs the Federal agency to provide certain funds to specific programs it has identified.
- Soft Earmarks: Congress identifies a program and directs the Federal agency to:
  - a. Evaluate the program; and
  - b. Fund the program, if warranted.

### **STATE GRANTS**

Washington State Agencies award grants to local jurisdictions to meet certain requirements or to implement projects that are a priority, to the state. The State frequently receives federal money with the requirement that it be passed through to local jurisdictions to implement specific projects or meet certain deliverables. SPD sometimes receives these types of funds from Washington State Department of Transportation (WSDOT), Parks and Recreation, the Auto Theft Prevention Authority, the Washington State Traffic Safety Commission (WSTSC), the State Patrol, Commerce, and the Washington State Emergency Management Division (EMD).

## **C-2 SOURCES**

### **US DOJ, COMMUNITY ORIENTED POLICING SERVICES (COPS) OFFICE**

- Numerous discretionary projects focused on law enforcement agencies primarily.
- Competitive grant projects focused on various aspects of law enforcement.

### **US DOJ, BUREAU OF JUSTICE ASSISTANCE (BJA)**

- Human Trafficking (HT) Grant
- Edward Byrne, Justice Assistance Grant (JAG); (City of Seattle/King County-formula based)
- Edward Byrne Memorial Grant (Competitive)

### **US DOJ, OFFICE OF JUVENILE JUSTICE AND PREVENTION (OJJDP)**

- Internet Crimes Against Children (ICAC) Grant

## **US DEPARTMENT OF HOMELAND SECURITY (DHS), FEDERAL EMERGENCY MANAGEMENT AGENCY (FEMA)**

- Urban Area Security Initiative (UASI)
- State Homeland Security Program (SHSP)
- Port Security Grant

## **WASHINGTON STATE TRAFFIC SAFETY COMMISSION**

- Traffic Safety related grants, such as DUI, Distracted Driving, Seat Belt and Emphasis Enforcement

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### ***D. YOUR IDEAS AND REQUESTS FOR GRANT FUNDS***

While many federal grant opportunities are focused on one problem or a set of very specific problems, there are grant opportunities that have flexibility in how grant funds can be spent. Grants and Contracts Unit staff shall be aware of operational needs, Chief's Strategic Plan, and locate grant and funding opportunities to meet these needs.

Grants and Contacts Unit Staff are interested in ideas and suggestions about the potential uses of grant funding. Staff will assist with "brainstorming" potential projects and developing grant ideas and/or proposals to see if they are appropriate for grant funding (now or at some time in the future).

Grant and Contract staff shall ensure that the Units they work with have received permission from their chain of command before embarking on the grant application process. All proposals for grant funding must include a detailed description of the project and approximate costs. By ensuring the chain of command is involved we ensure that:

- we are focusing our energies on the Department's priorities;
- consideration is given to whether the project should be funded through the SPD budget development process or through a grant;
- the Department has the staffing levels in place or is to plan for the staffing of the project; and
- when applicable, the Department has agreed to sustain the project beyond the life of the grant.

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### ***E. DEVELOPING A DEPARTMENT FUNDING STRATEGY***

In late Summer to late Fall of each calendar year a grant funding Strategy for the subsequent calendar year will be developed. The Strategy will address those SPD priority needs that will not be funded by the City Budget. The projects identified in the Strategy will be aligned with the Department's Strategic Plan and all projects will be linked to one of the Plan's Pillars of Policing. The SPD Grants & Contracts Unit will research public and private grant solicitations to tie potential funding opportunities to priority projects.

## **F. GRANT APPLICATION PROCESS AND PROCEDURES**

Through various sources, the Grants and Contracts Unit, or the Chief's Office, becomes aware of the opening of a grant application process. Depending on the needs of the Department; size and nature of the project; and purpose of the funding, a subject matter expert (SME) from the appropriate SPD organizational unit is assigned by executive staff to work with Grants and Contracts Unit Staff to develop the application. The application must contain all of the elements outlined in the application solicitation and be responsive to the spirit and intent of the grant requirements. The project concept must be reviewed through appropriate chain of command (COC) for operational applicability, which may require modifications to the project idea/concept based on Department priorities and the allowable uses of the grant funds.

Whenever there is a local match requirement for the grant, the application process must be vetted through SPD's Budget Unit. For technology projects, the project should also be vetted through Seattle IT Department (SealT).

After the proposal package/application is prepared and sent to the grant funding agency by Grants and Contracts, it can take two to six months for a grant funding decision to be made. It is not uncommon for a federal agency to ask for clarification and/or additional information about the application details with a short turnaround for responses. In these instances, it is essential that the Department be prepared and responsive to the inquiries. This will require the cooperation and support of the assigned SME.

If the Department is awarded the grant, SPD will receive the Grant Award Documents or a Sub-Award contract which specifies the approved activities/project(s), funding levels, the grant term, and any Special or General Conditions that apply to the grant allocation. The amount awarded may not always be what was requested. At this point, authorizing legislation from the City Council must be received in order to accept and spend the grant award. To trigger this process, the Grant Manager prepares a request for Special Ordinance Legislation and forwards it to the SPD Budget Unit. Appropriate legislation serves to formally accept the funds and add it to the appropriate SPD or other city agency budget. Upon receipt of spending authority, the Fiscal Unit assigns a special project and organization number for financial tracking and cost-accounting purposes. These numbers are used for all labor, purchase requests, overtime, travel and training requests to ensure proper grant accounting.

Because the award letter is usually received after the grant start date and the legislative process can take several months, it is not uncommon for grant projects to have a delayed start. It is important to consider that the start date of the grant may be prior to the award document being received. Grant manager and fiscal point of contact must go into GMS to report on prior quarterly progress and fiscal reports. These reports will be considered delinquent even if the award date is after the start date of the grant. This should be done as soon as the award documents are signed, sent back to the grantor and accepted.

Another issue in getting the grant project going is the occasional need to hire staff to manage the project. It can take several months for the hiring process to be completed; due to the SPD back-grounding process. Most often, however, management of the grant project is the responsibility of existing personnel in the Unit receiving the funds.

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## **G. THE GRANT APPLICATION: FORMAT AND CONTENTS**

In making a decision about whether or not to apply for a grant these are some questions to ask the SME:

- ✓ How does the proposed project align with the Department's Grant Funding Strategy?
- ✓ Is there buy-in and commitment of the respective Command Staff members that will oversee the project?
- ✓ What is the problem that you are trying to solve with grant funding?
- ✓ What approach will be taken to solve the problem?
- ✓ What deliverables will be produced from the project, and who and how will they be collected?
- ✓ How much will this approach/effort cost and how long will it take?
- ✓ Is there a commitment to sustain the project once the grant funding is depleted? – if not is there a natural end to the project?
- ✓ Who are the stakeholders in the project? How have they been involved in the planning process?

While staff from Grants and Contracts will facilitate the overall application process, essentially, it is the SME Project Manager that is responsible to write the project proposal, determine what outcomes are expected, how outcomes will be measured, and develop a detailed budget. A successful grant application will satisfy all the requirements of the grant solicitation or grant guidance as stated. A grant solicitation will frequently prescribe the format for the application, including font type, font size, and line spacing. If such elements are specified, consider the specifications as mandatory. The grantor will also frequently prescribe the components of the application itself, as shown below, as well as special requirements; which may include certain assurances that must be certified, qualifications of principal Project Leads, letters of support, certification against lobbying, and others. If these are specified in the solicitation they must be included in the application. Failure to do so may result in a reduction in the applications score, or for it to be rejected altogether.

Generally speaking, a successful grant proposal is one that is thoughtfully planned, well prepared, and concisely packaged. Although the actual grant application may use different language for the required application elements, there are usually eight (8) basic components:

- |  |   |
|--|---|
| 1) Proposal Abstract                                       | 2) Data Collection & Project Evaluation |
| 3) Introduction/Background of the Project and Organization | 4) Sustainment                          |
| 5) Statement of Problem                                    | 6) Project Budget & Budget Narrative    |
| 7) Project Goals & Objectives                              | 8) Project Design or Methods            |

**G-1) PROPOSAL ABSTRACT**

The proposal abstract is a short summary which outlines the project objectives, scope, and deliverables. The required format may vary from a cover letter to a separate document. It should be brief no longer than the requirements in the solicitation (typically 400 words). It is often helpful to prepare the summary after the proposal has been developed. This makes it easier to include all the key points necessary to communicate the objectives of the project. The abstract is a critical document, as reviewers that may not thoroughly read other lengthier components of the application, are likelier to thoroughly read the shorter abstract. Special attention should be given to any special instructions about the format and length of the abstract, as following the guidelines may be part of the application score.

**G-2) INTRODUCTION/BACKGROUND OF THE PROJECT AND ORGANIZATION**

Applications require a description of an applicant's organization, including detailed organizational charts, and how the project fits into Department Operations. The Introduction should contain the following areas:

- ✓ A brief biography of key staff members and researchers; and their role in the implementation of the grant – this may be a separate attachment in the application – it is vital that you read the solicitation for specific requirements
- ✓ The organization’s goals, philosophy and record with other grantors;
- ✓ Applicable success stories.
- ✓ Physical description of the area of concern e.g. if the VA hospital is related to the homeless person population, include it.

**G-3) STATEMENT OF PROBLEM**

The problem statement is a key element of a proposal. It should be a clear, concise, well-supported *statement of the problem* and how a successful project will address the problem. An applicant could include data collected; ensuring that all citations are provided in the application, that illustrates the problem(s) to be addressed. The information provided needs to be both factual and documented e.g. crime statistics and potentially news stories (with footnotes).

**G-4) PROJECT GOALS & OBJECTIVES**

Any good project proposal must have overarching Goals and Objectives. A brief review of the basics is shown below.

<b>GOALS:</b>	<b>OBJECTIVES:</b>
Describe a <i>broad plan</i> ;	Describe a <i>narrow plan</i> ;
<i>May not be strictly measurable or tangible</i> ;	<i>Must be measurable and tangible</i> ;

<i>Describe a purpose toward which an endeavor is directed.</i>	<i>Is something that one's efforts or actions are intended to attain or accomplish.</i>
<b>An example Goal is:</b> "to achieve success in combating the gang problem in the City of Seattle".	<b>An example Objective is:</b> "to increase gang interdiction and reduce gang activity by 10% by the end of the first quarter of the year".

A SME applicant should explain the expected results and benefits of each objective. They should also list the specific criteria of the grant program. Then, describe how the proposal meets each criterion.

**G-5) PROJECT METHODS OR DESIGN**

The project method outlines the tasks that will be accomplished with the available resources. It is helpful to structure the project method as a timeline. Early in the planning process, applicants should list the tasks that will have to be completed to meet the goals and achieve the objectives of the project. They can then break these into smaller tasks and lay them out in a schedule over the grant term. This will provide a chance to consider what personnel, materials, and other resources will be needed to carry out the tasks.

**G-6) PROJECT EVALUATION**

Applicants need to develop criteria to evaluate progress towards project objectives. It is important to define carefully and exactly how success will be determined. The data used for this has to be measurable. Identify the person (after speaking with them) who will track/provide it will ensure that it is measurable. Applicants should ask themselves what they expect to be different once the project is complete.

**G-7) FUTURE FUNDING**

Applicants may be asked to address sustainability of project funding by listing expected sources of continuing funding after the conclusion of the grant. The applicant may also be required to list other sources and amounts of funding obtained for the project.

**G-8) PROJECT BUDGET**

Funding sources require differing levels of detail in how the funds will be spent. Most governmental funding sources require a detailed budget and usually in the form of a Budget Detail Worksheet and accompanying Budget Narrative. A Budget Narrative is a word document that provides an explanation of each budget item in detail, how the line item will be used, and how the line item will support the project objectives. If the funding agency requires a specific format, you must provide the grant budget in that format. However, Grants and Contracts has a budget template in an Excel format. It is available to assist the SME develop the project budget.

The budget numbers and categories should be specific, follow the federal cost categories, and align with the solicitation requirements. While it is recognized that the application budget is an

estimate, the federal granting agency will be looking for unreasonable costs, which will negatively impact the application. Contingency and miscellaneous items should not be included in an application budget. Thoughtful budget planning, research, and preparation will garner a higher application score and strengthen the overall application.

The federal grantor recognizes that the application budget is an estimate based on the best information available at the time of application. Once the funds are awarded there may be some flexibility in moving money within budget categories; however, the overall grant award amount cannot be exceeded.

Some grants allow for minimal movement of funds between cost categories. Always refer to the grantor's guidance or award documents to determine how much flexibility the grant allows. DOJ grants do not allow movement of funds into cost categories that have zero dollars allocated to them, (2015 DOJ Financial Guide 3.5 Adjustment to Awards - Budget Modifications), no matter the dollar amount being moved. or If there is a change in the amount awarded vs. amount requested or a funding adjustment is needed to move funds from one category to another; a request to modify the budget must be in writing and constitutes a formal "**Grant Adjustment Notification (GAN) or Grant Modification Request (GMR).**" An approved and written response on the budget modification changes the approved budget but not the conditions under which the grant was awarded. Overall, careful planning at the outset will decrease the number of changes that may be required once the grant is awarded.

## **H. COMMON REASONS WHY GRANT APPLICATIONS ARE DENIED**

### **1. Failure to follow directions.**

- a. Read the information in the guidelines in the solicitation thoroughly.
- b. Pay close attention to submittal deadlines as well as method of submittal and where.
- c. Use proper formatting as stated and do not exceed page limitations.

### **2. Failure to itemize costs.**

- a. If you request equipment, make sure you shop for the best price. Then spell it out clearly: 10 Units at \$100 for a total cost of \$1,000.
- b. Don't forget about training costs.
- c. Administrative costs.
- d. Travel costs to attend training, conferences, or to take delivery of equipment.
- e. Overtime/backfill costs.
- f. Shipping costs.
- g. Taxes
- h. Service and maintenance costs or extended warranties, if allowed by the grant.

**3. Not making a case on a cost-benefit basis.**

- a. You must show that the dollars expended produce the largest benefit to your agency and to your partners.
- b. It is imperative to include mutual aid situations and interagency cooperation. Include the other agencies in your plans, and show that your receipt of the equipment helps other jurisdictions and the community at large.

**4. Not providing an adequate description of the problem.**

- a. You have to provide a “realistic state of the community and my department” statement.
- b. Describe in detail why you are having the problem and, where appropriate, compliment the description with visual aids; charts, graphs, or statistics.
- c. Who, What, When, Where and Why. The Why should be compelling and persuasive. Why should the grantor give SPD the money versa another law enforcement agency?
- d. You are an artist painting a picture with words; you must immerse the reviewer into your community and its problems.

**5. Shopping around” for the lowest prices.**

- a. The Federal minimum guideline says that you should obtain two quotes. Remember to follow your local procurement policies and procedures.
- b. Don’t ask for a Cadillac if a VW will do the job.
- c. Reviewer’s hate “greedy” departments. If you raise the “greedy flag,” you stand the chance of being denied or rejected. The request must be reasonable for your department and the problem you are describing.

**6. Not making a compelling case of financial need.**

- a. You have to make a strong argument that you cannot afford to fund this activity (e.g., tax referendums were defeated, businesses moved out, layoffs, recession, etc.). State what funding options were tried and what success levels you attained, or didn’t attain.
- b. Keep your request in line with your agency size, personnel and the community you service.
- c. They must know you are attempting to handle the problem yourselves, but are not able to resolve the problem without financial assistance.

**7. Failing to check your work in the document.**

- a. Do all your figures match?
- b. Have you left out an important detail?
- c. Do you have spelling errors?
- d. Have you met every application requirement listed in the guidance?

- e. Have it proofread by subject matter experts, peers, or colleagues before submitted.
- 8. Failing to explain and demonstrate collaborative efforts and interagency cooperation.**
- a. Make sure you include this element in your grant.
  - b. Place the header or sub-header “Interagency Interoperability” so it gets noticed.
  - c. Show that the stakeholders were involved in the process or that their concerns are being addressed.
- 9. You requested items which are low priority.**
- d. Request items specifically stated to be receiving a high priority and stay away from the lower priority items.
  - e. Mixing higher priorities with lower priorities lowers your total overall score.

***I. GRANT FUNDING AGENCY EXPECTATIONS***

In awarding the funds for a specific project, the funding agency expects that SPD will do what was proposed in the application, with normal operational rules and regulations. Awarding agencies, both federal and state, expect us to stay on schedule and are interested in seeing the results of the project as soon as possible. Agencies, particularly DOJ, also occasionally requests special information about the project’s progress in order to respond to questions from Congress or the Executive Branch.

***J. GRANT & PROJECT MANAGEMENT RESPONSIBILITIES***

Since most grants fund an operational field element at some level, the effective management of grants, in general, is a shared responsibility between Grants & Contracts Unit staff and the SME from the operational Unit implementing the project. GCU staff will coordinate and communicate with the granting agency, as necessary, facilitate and oversee the application process, ensure that grant Special Conditions are met, ensure that required progress reports are developed by the SME and submitted, staff and respond, as necessary, to official project Audits and assist, generally, with funding agency site-monitoring visits. GCU staff is also available to help with any grant-related questions about the project.

The SME most knowledgeable of the projected work will serve as the Project Manager (PM) and is usually from the operational unit applying for the funding. The Project Manager is responsible for the day-to-day management of the actual project that is being funded by the grant, rather than the grant management. Grant management and oversight is the responsibility of GCU staff. The SME will need to provide reliable oversight of the project to ensure it is progressing as expected and performance and appropriate expenditures are tracked. Accordingly, the SME will also need to provide progress information so that progress reports can be prepared for submission to the granting agency.

GCU staff is responsible to maintain effective liaison with the assigned SMEs to ensure smooth grant project implementation and management. As noted above, the Fiscal Unit collects grant expenditure data for reporting purposes. However, it is operationally necessary for the SME to authorize expenditures, via the electronic **1.5 System**, and track expenditures in order to properly manage the project. There are several reasons for this, including the time lag in the city’s financial management

reporting system and the need to spread the funds over the entire project period in accordance with the proposed budget.

## **J-1 WHAT IS GRANT MANAGEMENT?**

**Grant Management** is generally performed by a member of the GCU and typically involves the following:

- a. Research and identify potential grant opportunities that support the Department Strategic Plan and Mission.
- b. Disseminate information on potential grant opportunities to relevant Department staff and solicit their interest, needs, and priorities.
- c. Assist Department staff in the interpretation of grantor's guidelines.
- d. Upon decision to apply for a grant, provide technical assistance to SME and/or designated Project Manager in overall grant proposal writing and preparation, including budget development.
- e. Establish timelines for grant application development and submission, adhering to deadlines established by the grantor.
- f. Finalize the grant application package including final review of the project narrative, project time-line, budget, budget narrative and executive summary. Grant application submission must be done in accordance with grantor solicitation guidelines.
- g. Provide notification to the Department Legislative Liaison to seek support for the project with State or Federal elected officials when advantageous.
- h. Maintain a file for each grant awarded, which includes (at a minimum) the following:
  - 1) Grant application
  - 2) Grant award notice/amendments and any Special Conditions (must maintain originals)
  - 3) Budget
  - 4) Correspondence
  - 5) Related reports (inclusive of programmatic and fiscal reports)
- i. Work with Fiscal Unit to:
  - 1) Establish specific grant project coding for tracking grant expenditures.
  - 2) Oversee and approve grant expenditures and assure alignment with approved budget.
  - 3) Ensure that required Financial Reports are completed and appropriately filed with the grantor.
- j. Coordinate with the Project Manager for the timely submission of all programmatic or progress reports, adhering to reporting cycles established by the grantor.

- k. When necessary coordinate with the Project Manager to seek formal approval for changes in the scope, project period, budget adjustments, or key personnel changes of the grant from the grantor.
- l. Coordinate with Project Manager on the closeout of grants and ensure completion of outstanding reports.

## **J-2 WHAT IS PROJECT MANAGEMENT?**

Irrespective of the funding or revenue source (federal, state, general fund, or Seattle Police Foundation), project management involves planning, organizing and managing resources, both funding and staff, to bring about the successful completion of specific project goals and objectives.

A project is a finite endeavor--having specific start and completion dates--undertaken to meet particular goals and objectives, usually to bring about beneficial change or added value. This finite characteristic of projects stands in contrast to processes, or operations--which are repetitive, permanent or semi-permanent functional work to produce products or services. In practice, the management of these two systems is often found to be quite different, and as such requires the development of distinct technical skills and the adoption of separate management.

The primary challenge of project management is to achieve all of the project goals and objectives while honoring the project constraints. Typical constraints are scope, time, and budget. The secondary—and more ambitious—challenge is to optimize the allocation and integration of inputs necessary to meet pre-defined objectives.

**Project Management** typically involves the following:

- a. Manage all operational elements of the project as the SME is the one most knowledgeable of the project,
- b. Ensure that the Fiscal Unit and Legislative Liaison are apprised of the grant award to establish a project tracking number and the required authorizing legislation, respectively.
- c. Maintain a Project Working File of the project that is complete with a detailed work plan budget, time line, correspondence, and submitted reports.
- d. Ensure progress is made toward achievement of documented grant project goals.
- e. Approve and manage expenditure transactions processed against the grant project tracking number, and monitor account status, with the assistance of the Fiscal Section representative.
- f. Immediately notify the assigned Grant Manager of any major change in staff or budget for the grant project and complete and coordinate any requests for amendments from the grantor, which may result in changes in the scope of the grant project.
- g. Craft and coordinate with the Grant Manager the timely submission of all grant project reports, including required programmatic reports, adhering to reporting cycles established by the grantor or grant special conditions.

- h. Disseminate grant project reports and other correspondence related to the grant to the GCU Manager and Fiscal Section representative.
- i. Coordinate with the Grant Manager the closeout of grants and complete outstanding reports, as necessary.

The following table outlines the differences between the duties of the project grant manager versus the project manager.

**GRANT MANAGEMENT AND PROJECT MANAGEMENT TASK BREAKDOWN**

	Grant Manager	Project Manager
Research, identify, and disseminate potential grant opportunities	X	
Notify operations about grant opportunity	X	
Oversee grant application process	X	
Review and submit grant application documents	X	
Review and approve purchase orders	X	
Review & approve travel requests. Provide breakdown of preapproved costs to fiscal staff	X	
Listed as Point of Contact for federal counterpart and in federal portals, i.e. GMS	X	
Point of Contact for Auditors and coordination point between Auditor and Operational Staff	X	
Point of Contact with Operational Staff on all grant related issues		
Submit GANs, write memos or provide backup documentation	X	
Resolve accounting errors with grant accountant	X	
Finalize, review, sign-off, and route contracts/agreements for signature to legal and COO, distribute originals, file originals with City Clerk's Office	X	
Reconcile grant expenditures during and at the end of the grant cycle	X	
Train operation staff on grant vs project management tasks	X	
Prepare and submit supplemental information for CBO	X	
Review budget supplemental information before submittal	X	
Attend monthly fiscal grant status meetings	X	
Maintain grant files; application, award notice, budget, timeline, etc.	X	
Review and submit progress reports to grantor	X	
Authorize grant overtime expenditures	X	
Track grant expenditures	X	X
Liaison with fiscal or budget staff as needed	X	X

Respond to questions from CBO, City Council or SPD budget staff	X	X
Interpret and explain grant requirements to ensure compliance with federal requirements	X	X
Initiate routine communication	X	X
Collaborate on audits, resolve findings, provide information	X	X
Develop grant application material		X
Submit purchase orders		X
Develop consultant, interagency agreements		X
Develop written policies, protocols, and procedures		X
Liaison with external federal, state, or local agencies		X
Provide advice and guidance as SME		X
Attend operation meetings		X
Maintain working project files		X
Develop monthly, quarterly & semi-annual progress reports		X
Document progress towards goals and performance measures		X
Manage expenditures, provide financial reports to COC		X
Notify GCU and Fiscal staff of personnel changes		X
Provide semi-annual staff certifications to GCU personnel		X
Oversee and track public outreach efforts		X
Coordinate with GCU on questions about grant guidance or allowability		X
Provide grant guidance to personnel that support the grant projects through victim advocacy, data collection, and prosecution		X

## **K. GRANT REPORTING REQUIREMENTS**

Both the Grant Manager and the Project Manager will need to keep records and track the outcomes of the project for reporting purposes. For most grant projects, there will be periodic reports (quarterly, every six months, and/or final reports) that the Project Manager will need to prepare. The type of data to collect varies by grant project, but could include equipment purchased, number of arrests (in a certain time period or geographical area), victims assisted, staff hired, training sessions held, cases sent to prosecution, etc. The Fiscal Unit collects all grant-related costs and expenditures, and prepares the official financial reports required.

Many grant funded projects will require a final closeout report or a final progress report. However, the format will vary depending on grant requirements. Typically, the grant solicitation will outline what the reporting requirements are, including format and content. The closeout requirements will be dictated by the grant award or sub-award agreement. The requirements must be closely followed to ensure

deadlines are met. GCU staff will provide assistance in ensuring that all reports are developed and submitted in accordance with the grant requirements.

## **L. OTHER REPORTING AND PRE-APPROVAL REQUIREMENTS**

The Grantor also requires that all special reporting requirements are met and that all federal financial policies and guidelines are followed. Certain activities that are approved for funding in the grant award will require additional approval and may require pre-approval before activities can occur.

### **L-1) FFATA REPORTING**

To maintain compliance with the Federal Funding Accountability and Transparency Act (FFATA), the GCU is responsible for accurate tracking and recording of the sub-recipients of federal grants, under specific conditions.

All grants that sub-award funds or have contracts with Consultants or Vendors are subject to this federal requirement. The specific requirements and conditions can be found at [https://www.fsrs.gov/documents/FSRS\\_Awardee\\_User\\_Guide.pdf](https://www.fsrs.gov/documents/FSRS_Awardee_User_Guide.pdf). Any contract or sub-award, funded with federal funds, that exceeds \$25,000 must be reported on the FSRS website at <https://www.fsrs.gov>. In coordination the Project Manager and Grant Manager are responsible for tracking all contracts and sub-awards. When they determine that a contract meets had exceeded the \$25,000 threshold they are required to inform the Grants & Contracts Unit Manager and provide the following information:

- Award Federal Award Identifier (FAIN)
- Organization Name
- Address
- Congressional District
- Amount of sub-award
- Statement of work

This information must be forward to the Unit Manager immediately upon execution of the agreement. The federal reporting must be submitted **no later** than the end of the month following the month in which a sub-award agreement was executed.

The Grants and Contracts Manager will be responsible for maintaining a Department account at [www.fsrs.gov](http://www.fsrs.gov) and will submit each sub-recipient report on the website. The electronic confirmation of the submission will be forwarded to the appropriate Grants Manager for their grant file. The confirmation will be retained in the grant file as a record for any future audits.

### **L-2) CONFERENCE REPORTING AND PRE-APPROVAL REQUIREMENTS (DOJ GRANTS ONLY)**

Under the Department of Justice Conference Approval, Planning, and Reporting Policy (DOJ Financial Guide 3.10) a conference is defined broadly to include meetings, retreats, seminars, symposia, events, and group training activity (2CFR 200.432) (2015 DOJ Grants Financial Guide 3.10 – Definitions). The DOJ Conference reporting and approval guidance applies to both Grant Awards and Cooperative Agreements

however; the requirements are different. This policy applies only to those conferences that the grantee sponsors or conducts as part of the project being federally funded. It does not apply to those conferences that the grantees representatives merely attend.

Conferences conducted by **grant** recipients do not require prior approval. However, grant recipients must ensure compliance with the food/beverage, meeting room/audio-visual, logistical planner, and programmatic planner limitations and cost thresholds listed below.

All conferences conducted by **cooperative agreement** recipients or contractors funded by OJP/COPS Office must receive prior written approval from the grantor. An approved budget that lists the conference does not constitute approval. All prior approval requests for conferences costing \$100,000 or less and not exceeding any cost thresholds must be submitted a minimum of 90 days in advance of the start date. All conferences costing more than \$100,000 or exceeding any one cost threshold must be submitted a minimum of 120 days in advance of the start date. Throughout the conference planning process, the Federal Program Manager should be regularly updated on progress any major decisions. No hotel/venue or audio-visual contracts may be entered into before the prior approval has been obtained in writing from OJP/COPS Office. DOJ [Conference & Events Submission Form](#).

Cooperative agreement recipients and contractors conducting conferences that cost more than \$20,000 must report actual conference expenses to their Federal Program Manager within 45 days after the last day of the event.

### **Thresholds**

As well as prior approval requirements the policy requires that costs not exceed certain thresholds. They are as follows:

- Cost thresholds and limitations are in place for the following items:
- Meeting room/audio-visual services (lesser of \$25 per day per attendee or \$20,000)
- Logistical planners (lesser of \$50 per attendee or \$8,750)
- Programmatic planners (lesser of \$200 per attendee or \$35,000)
- Food and beverage (generally not allowed)
- Refreshments (generally not allowed)
- Cost thresholds and limitations are in place for the following items:
- Meeting room/audio-visual services (lesser of \$25 per day per attendee or \$20,000)
- Logistical planners (lesser of \$50 per attendee or \$8,750)
- Programmatic planners (lesser of \$200 per attendee or \$35,000)
- Food and beverage (generally not allowed)
- Refreshments (generally not allowed)

To be responsive to the Conference Pre-Approval requirements the Project Manager that is planning a conference will review the policy in the DOJ Federal Financial Guide.

- If the applicable project is funded by a Grant, the Project Manager will ensure that conference cost thresholds are not exceeded.
- If the applicable project is funded by a Cooperative Agreement, the Project Manager will ensure that:
  - written approval is obtained from the Federal Program Manager prior to making any type of obligation related to the conference;
  - no contracts are signed, no work authorized, and no obligations is made prior to receiving approval;
  - they have completed the Department of Justice Conference & Events Submission Form for conferences \$100,000 or less, and within cost thresholds, within 90 days of conference and for conferences costing more than \$100,000, and within cost thresholds, 120 days in advance of the conference. (Form available through link in Federal Financial Guide);
  - conference costs are coded so they can be tracked separately from other grant expenditures;
  - locations for conferences, if not provided by other governmental agencies at no cost to the grant, are selected based on a survey of the region in which the conference is given and a cost comparison of all venues;
  - estimates for costs of conferences are based on the fair market value for the area in which the conference is held. Fair market value is established by comparing three or more similar items;
  - the Conference Cost Submission Form contains information the Project Manager has gathered based on the survey of the area, fair market value and the number of attendees expected to attend the conference;
  - staff time and effort related to the logistical and programmatic support of the conference are noted on the city timecard using the specific conference code assigned by Fiscal. Individuals working on the conference will indicate time spent on the project up to a quarter hour increments;
  - all conference costs for events costing more than \$20,000 or where more than 50% of attendees are DOJ employees, must be reported within 45 calendar days after the last day of the event;
  - actual costs are submitted to OJP on the Conference & Events Submission Form via email;
  - final costs are reported with explanations, number of attendees and all requested information prior to the deadline of 45 calendar days.

### ***L-3). WHEN ADJUSTMENTS TO THE GRANT AWARD MUST BE REPORTED & APPROVED***

Most federal grants require pre-approval when major changes to the original application or the grant award conditions are needed. Each Federal Awarding Agency handles this pre-approval process

differently. Review the requirements to make a change to the grant with the Federal Program Manager; Federal Agencies Financial Guide, or the Award Documents. These are the types of changes that will typically require pre-approval and/or official notification.

- Change in key personnel
- Change in the scope, duration, achievement, or the award objectives
- How and when budget modifications must be pre-approved vary between federal agencies. Always check with the Federal Project Manager before expending funds in a way that does not align with the approved budget. Typical changes that must be pre-approved include:
  - Spending funds in a cost category that was not included in the approved budget. For example, if the cost category “Travel” did not exist in the original budget, the adjustment to transfer funds from Equipment to Travel requires approval.
  - The proposed cumulative change is greater than 10% of the total award amount.
- Requests for an extension of the grant end date
- Foreign Travel, which may include Canada and sites outside the continental U.S. (Alaska, Hawaii)
- Compensation for consultant services in excess of the grant-making component’s maximum hourly or daily rate for an 8-hour day - currently \$650 or \$81.25 per hour.

#### **L-4) SOLE SOURCE CONTRACTING PRE-APPROVAL**

Sole source contracting is a unique exception in the view of both the City and Federal Procurement Guidelines. As stated in the City’s procurement manual, we have a public duty to competitively bid projects and acquisitions. A specific condition must exist before a Project Manager enters into a sole source contract. There must be clear and appropriate reason for specifications that narrow the field to sole source contracting or procurement. (Refer to the City’s Procurement Manual and Federal procurement guidance for specifics). However, there will be situations when sole source contracting or procurement are the only option. Federal rules require that sole source procurements in excess of the Simplified Acquisition Threshold set in accordance with 41 U.S.C. 1908 (**currently set at \$150,000**), must receive prior approval from the Grantor before entering into the contract. Review the City’s procurement guide at ([http://inweb.ci.seattle.wa.us/purchasing/imabeginner\\_purchases.htm](http://inweb.ci.seattle.wa.us/purchasing/imabeginner_purchases.htm)) for City sole source rules. The Sole Source Justification Form can be found there, which must be signed by a Captain, Captain equivalent, or above.

#### **M. SUBRECIPIENT MONITORING**

The Code of Federal Regulations (2 CFR 200.92) defines a sub-award as an award provided by a pass-through entity to a sub-recipient for the sub-recipient to carry out part of a Federal award received by the pass-through entity. It does not include payments to a contractor or payments to an individual that is a beneficiary of a Federal program. A Subrecipient is defined as (2 CFR 200.93) a non-Federal entity that receives a sub-award from a pass-through entity to carry out part of a Federal program.

When SPD passes through funds to subrecipients it takes on the obligation to monitor their work (2 CFR 200 Part D & Part F). SPD Monitoring goals are:

- ensure funds are being used for the authorized purpose;
- gauge and measure compliance to federal rules and regulations;
- assist the sub recipient with the grant process and provide guidance to improve sub recipient administrative efficiencies and programmatic effectiveness;
- reinforce channels of communication with sub recipients;
- review sub recipient accounting controls for compliance with regulations, grant award and Interagency Agreement terms and conditions;
- review overall performance and ensure performance goals are achieved;
- ensure subrecipient has not been suspended or debarred for receiving federal funds;
- Ensure the subrecipient's work is in compliance with the program requirements, the grant requirements, and all laws and regulations;
- the goals and objectives of the sub award are met;
- the financial accounting of the funds awarded meet federal fiscal management standards.

The first step in the monitoring process is to ensure that the subrecipient understands that the source of the funding is federal and as such, they are required to follow all the same federal rules and regulations as SPD as the grantee. The way SPD does this is by including a funding clause in all contract documents that are federally funded. The clause must include the CFDA #, the federal grant name, and include reference to the attached award document. The award document must be attached as it includes all of the grant identifiers and special conditions that subrecipient must adhere to. The contract clause should include the following language.

#### **FUNDING SOURCE**

This contract is funded with federal grant funds under CFDA #\_\_\_\_\_. The grant is the (grant year and name), Award #\_\_\_\_. All federal financial and grant management rules and regulations must be adhered to in the execution of this contract. Exhibit \_\_ is a copy of the federal award documents (or substitute 'subgrant contract'). All conditions stated in the award documents apply to the execution of this contract.

The following must be included in either the clause, and/or must be contained in the award document

- Federal Award Number;
- Subrecipient Name (which must match the registered name in DUNS);
- Subrecipient DUNS number;

- Federal Award Identification Number (FAIN);
- Federal Award Date;
- Subaward Period of Performance Start and End Date;
- Total Amount of Federal Funds Obligated to the Subrecipient;
- Total amount of the Federal Award;
- Federal Award Project Description;
- Name of the Federal Awarding Agency, Pass-through entity, and contact information for the awarding official;
- Catalog of Federal Domestic Assistance (CFDA) number and name;
- Identification of whether the award is Research and Development (R&D);
- All requirements imposed by the pass-through entity on the subrecipient so that the federal award is used in accordance with federal statutes, regulations and the terms and conditions of the federal award;
- Any additional requirements that the pass-through entity imposes on the subrecipient in order for the pass-through entity to meet its own responsibility to the Grantor;
- Indirect cost rate to be used by the subrecipient (either a federally-approved rate, a rate negotiated between the pass-through entity and the subrecipient, or the de minimis indirect cost rate);
- A requirement that the subrecipient permit the pass-through entity and auditors to have access to the subrecipient's records and financial statements as necessary for the pass-through entity to meet the requirements of 2 C.F.R. § 200; and
- Appropriate terms and conditions concerning closeout of the subaward.

In addition to these requirements, SPD must monitor both the progress of the project being implemented and the subrecipient's use of federal funds. SPD's monitoring plan for each subrecipient will be based on the complexity of the project, the amount awarded, and the subrecipients experience managing federal funds. While most of the entities SPD will subgrant to are other governmental agencies that are familiar with federal contracting, these factors must still be taken into consideration when determining the type of monitoring required. The higher the risk in the subrecipient successfully managing the federal funds, the more extensive the monitoring should be. The following types of monitoring will be utilized in the SPD Monitoring Plan:

- Routine oversight and regular communication

All subrecipient's, no matter their risk level, should receive this type of monitoring. The grant manager will review all invoices and requests for reimbursement to insure all costs are allowable under the contract, fall within the approved budget, and contain the appropriate level of back up documentation to justify the costs. Requiring more detailed back up documentation with

reimbursement requests, can ensure that errors or questions are dealt with before reimbursement is made, rather than having to make corrections after. Documentation of questions asked and responses received should be maintained in the grant file.

The Grant Manager will have regular check-ins, at least quarterly, to determine status of the project. A log of conversations or emails exchanged will be maintained in the grant file.

Any Subrecipients that receive an audit finding related to the subrecipient contract must immediately supply SPD with the completed. The Grant Manager will review the audit to determine the impact on SPD's grant award. If there are impacts the Grant Manager will consult with their Manager, and within 6 months of the audit issue a management decision. The Grant Manager will also monitor the subrecipient to ensure timely corrective action on the finding.

- Desk Monitoring

For those subrecipient's that SPD has limited experience contracting with, a bi-annual desk monitoring is appropriate, depending on the length of the contract. This tool can also be used to document status check meetings for more involved, complex projects. This tool should be used to document progress, reminders of important deadlines, closeout requirements, or other critical steps in the process.

Site monitoring visits should be conducted for complex expensive projects, where SPD has limited experience with the subrecipient, or for projects that require in-depth status checks. They can be used for either project monitoring, fiscal monitoring, or equipment monitoring. SPD has a Site Monitoring Form that it utilizes to capture the details of these meetings.

Site visits for project monitoring should be done on an as needed basis in concert with desk monitoring. Fiscal monitoring should be done at least once during the life of the contract, usually before the final closeout.

Equipment monitoring should also be done before the final closeout of the contract and then once every 2 years thereafter. During these monitoring visits the Grant Manger should ensure that:

- the equipment is being used for its intended purpose
- if applicable, the equipment received required approvals before it was purchased
- The equipment was procured through a complete process or a sole source contact meeting all the federal requirements is in place
- the agency has secure storage plan for small and attractive items, if applicable
- the vehicle usage is being logged
- the equipment is being recorded on the agencies asset management system
- the equipment has an asset tag

- the asset management system includes entries identifying the funding source (CFDA #), up to date status of equipment, notation as to the federal grant that funded it, disposition if it was hand received
- maintenance records are maintained

During equipment monitoring visits pictures of equipment should be taken and included in the visit report.

## **N. SUSPENSION & DEBARMENT (PLACE HOLDER – IN DEVELOPMENT)**

### **O. GRANT FUNDED TRAVEL**

SPD employee travel costs funded by grants must comply with either State or Federal travel regulations. The funding source and the Grantee of the funds will determine which guidelines must be followed.

The following is a comparison of City, State, and Federal travel regulations, to determine what regulations apply for specific travel situations. This analysis is specific to those federal grants which the Grants & Contracts Unit administers. If a circumstance is not specifically addressed here refer to the City Travel Policy and the SPD Travel Policy and Procedure Guidelines.

For those grants funded by the Department of Justice the DOJ OCFO Financial Guide was reviewed. In regard to travel generally, the Financial Guide states that for domestic travel recipients must follow their own established travel rates. Given this guidance all guidance below for DOJ funded grants will defer to the City Policy.

Several federal grants SPD receives are subgranted from another jurisdiction. Due to this contractual relationship, the sub-recipient contract language will dictate the rules surrounding travel rates and regulations. The Contracts currently in place for Homeland Security Grant Program funds all reference the State travel regulations (WA State Administrative and Accounting Manual-SAAM).

#### **What meal (per diem) rates should be used for federally funded travel?**

Both city and state policies require the federal meal rate to be used for all travel funded by federal grants. The Runzheimer meal rates can never be used for travel funded by State or Federal sources if they exceed the federal meal rates.

#### **What meals can be reimbursed?**

City policy states that any meals paid for as part of the registration fee cannot be reimbursed. City policy is silent on continental breakfasts except in relation to Runzheimer rules, in which case they are not considered a meal. State policy states that meal payments will not be reduced due to meals on airlines. Additionally, it states that continental breakfasts included in lodging rates or registration fees will not cause the meal payment to be reduced.

Meals on airlines and continental breakfasts will not be considered a meal for the purposes of calculating per diem reimbursement. Any meals paid for with registration fees will be counted as a provided meal and will cause the per diem reimbursement to be reduced.

### **What meals are reimbursed on travel dates?**

Since the Federal and State regulations are silent on what meals are included in the per diem rate on travel dates. It will be determined by the City guidance related to what time of day travel begins from Seattle and what time of day travel ends in Seattle. (Section 5.2.2). Under Section 1.1.6, the travel policies do not apply to an employee's normal commute. If travel to the airport is part of the traveler's normal commute, travel time starts upon arrival at the airport. If not, travel time to the airport starts when the traveler leaves their home or office. Once the official travel time begins the traveler qualifies for whichever meals are appropriate from that point forward.

### **What lodging rates should be used for federally funded travel?**

This depends on who the grantor is.

- If the travel is funded by City General Fund refer to the City Travel Policy.
- If the grant is a direct award from the federal government, refer to City Travel Policy.
- If the funding is sub-granted from a state or other non-federal source refer to the pass-thru agreement.

## ***P. MORE QUESTIONS AND INFORMATION***

As noted, additional information about all of the sections in this Grant Owner's Process Manual is available from the Grants & Contracts Unit staff. Also, if you have an idea but do not know if it will fit into a grant application or how best to proceed with a project idea, please feel free to contact the Grants & Contracts Unit Manager, Sheryl Jardine.