

**SAN DIEGO POLICE DEPARTMENT
PROCEDURE**

DATE: MAY 24, 2022

NUMBER: 1.40 – ADMINISTRATION

SUBJECT: GRANT PROCEDURES

RELATED POLICY: N/A

ORIGINATING DIVISION: ADMINISTRATIVE SERVICES

NEW PROCEDURE:

PROCEDURAL CHANGE: **EXTENSIVE CHANGES**

SUPERSEDES: DP 1.40 - 03/25/2016

I. PURPOSE

This Department procedure establishes procedures and protocol for identifying potential grants, requesting approval to apply, completing applications, accepting awards, and managing grant funds and programs.

II. SCOPE

This procedure applies to all members of the Department.

III. BACKGROUND

- A. The Department has a long-standing and successful grants acquisition program. The vast majority of grants are from State and Federal government agencies, with some from private foundations and corporations.
- B. Grant funds must be used to supplement and not to supplant resources that would be available to the Department (or the City) in the absence of the grant.
- C. Department members shall not participate in activities involving the use of grant funds where there is a financial interest or benefit to:
 - 1. Themselves, immediate family, partners, organization (other than a public agency in which he or she is serving as an officer, director, trustee, partner or employee); or,

2. Any person or organization with whom he or she is negotiating or has any arrangement concerning prospective employment.
- D. Department members must avoid actions that result in, or create the appearance of:
1. Using an official or grant-funded position for personal gain;
 2. Giving preferential treatment to a particular person or project;
 3. Losing independence or impartiality;
 4. Making a decision outside official channels; or,
 5. Adversely affecting the confidence of the public in the integrity of the government or the program.

IV. DEFINITIONS

- A. Award Documents – the official notification of selection for funding. No grant funds will be authorized or obligated until these documents are signed by the director of the Granting Agency and the Mayor, or other designee.
- B. Grant – money, resources, and/or technical assistance provided (usually by a State or Federal agency) for a specific purpose.
- C. Grant Advisor or Grant Monitor – an employee of the Granting Agency who is assigned to monitor the progress of a specific grant program. Most Grant Advisors are located in Sacramento or Washington D.C.
- D. Grant Coordinator – the Department staff member (Police Officer, Sergeant, Management Analyst, or other) who is responsible for the daily operations of a specific grant.
- NEW E. Grants Manager – an Administrative Services Program Coordinator with administrative responsibility for the Department’s grant program.
- NEW F. Grantee – the grant recipient, who will be the City of San Diego.
- NEW G. Grantor or Granting Agency – the entity that is offering or awarding the grant, typically a State or Federal agency.
- H. Proposal – the grant application materials prepared by the Department.

NEW

- I. Request for Proposal (RFP) / Notice of Funding Availability (NOFA) – the announcement by the grantor that grant funds are available. It includes the grant requirements, the grant application forms, and describes the granting process.
- J. Supplanting – to deliberately reduce the amount of federal, state, or local funds appropriated to an existing program or activity because a grant has also been awarded for the same purposes. When the recipient replaces funds in this manner, it reduces the total amount that would have been available for the stated grant purpose, and the substitution results in supplanting.

V. PROCEDURES

A. Locating and Reviewing Potential Grants

NEW

- 1. All potential grants will be reviewed by the Grants Manager and approved by the Administrative Services Manager prior to being presented to the Executive Assistant Chief of Police and Chief of Police for final approval.

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- 2. The Grants Manager is the primary person responsible for locating, reviewing, and preparing summaries of potential grants for review and approval by the Administrative Services Manager, Executive Assistant Chief of Police and Chief of Police

- 3. All other Department personnel who locate a potential grant opportunity must immediately:

- a. Contact the Grants Manager to determine the feasibility of applying.

- b. Consult their chain of command to determine whether there is support for the grant application.

NEW

- c. Provide the information to the Grants Manager to obtain approval from the Administrative Services Division Manager, Executive Assistant Chief of Police and Chief of Police to apply **BEFORE** the grant application is written or submitted for signatures.

B. Preparing Grant Applications

Prior to writing a grant proposal:

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- 1. The Grants Manager must review the RFP/NOFA for all information, including due date, eligibility, purposes of the grant, required matching cash or resources, renewability, authorized expenditures, and other important information.

2. The Grants Manager will prepare a memo that summarizes the necessary information for obtaining the recommendation from the Administrative Services Manager. The summary will include the grant budget and the fiscal impact of managing the grant.

NEW

3. The Chief of Police will make the final determination whether the Department will apply for the grant and, if appropriate, details of the program to be proposed.

4. The Grant Coordinator and Grants Manager have co-responsibility for preparing the grant proposal. The Grants Manager is the only Department member authorized to enter and/or submit a final proposal to the Granting Agency.

C. City Authorization to Apply for, Accept, and Expend Grants

NEW

1. If a grant award is less than \$1,000,000 the Police Department shall require approval to apply, accept, and expend grant funds via a Mayoral Action via the OnBase electronic docketing system. Administrative Regulation (AR) 1.80, Grant Application Procedures, shall be followed,

NEW

2. If a grant award is greater than \$1,000,000, or if the granting agency indicates as a requirement, a City Council Resolution is required to "apply for, accept, manage, modify, or expend" the grant. This is accomplished in one City Council Resolution. AR 1.80, Grant Application Procedures, shall be followed.

NEW

3. The Grants Manager and the Grant Coordinator have co-responsibility for preparing the Mayoral Action or the Request for Council Action, as appropriate. The Grants Manager is the only Department member authorized to enter or submit the Request via the OnBase electronic routing system. Department Procedure 1.24, Processing Requests for Council Action/Interface with City Council, and Administrative Regulation 3.20, Processing Requests for Council Action for Approval of a Resolution or Ordinance, shall be followed.

NEW

4. If a City Council Resolution is required, the Grants Manager and the Grant Coordinator will attend the City Council Committee meeting, the City Council meeting, and any Council and/or Mayoral briefings, as requested.

5. After City Council authorizes the grant, the Grants Manager will obtain a copy of the completed Resolution and forward copies to all appropriate recipients.

D. Accepting Grant Awards

NEW

1. Per AR 1.80 dated November 30, 2018, the Chief of Police is authorized to enter into grant agreements on behalf of the City after obtaining authorization from City Council when the agreement is for \$1,000,000 or more; or after obtaining Mayoral approval when the agreement is for less than \$1,000,000.
2. The Grants Manager is responsible for obtaining all appropriate award documents from the Granting Agency, obtaining the appropriate signature(s), returning the signed documents to the grantor, and distributing copies to all appropriate recipients.
3. The Grants Manager will establish a grant file which will contain all official documents and back-up material related to each respective grant.
4. Each grant will be assigned a unique Grant Number and unique Internal Order numbers, which will be used for all expenditures debited and revenues credited to the grant.
5. Grant funds will NOT be expended unless a signed approval notice is on file with the Department of Finance.
6. The only City employees authorized to enter into and sign a grant are the Mayor or their designee. Recipients must maintain this written authorization on file and make it available upon demand to the granting agency. Whenever possible, it is best to use the official's title rather than the person's name.

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VI. MANAGING GRANTS

A. The Grant Coordinator is responsible for:

1. Day-to-day grant operations.
2. Ensuring proper use of all Grant accounting numbers, including Internal Order numbers, on ALL payroll (including overtime) and purchasing documentation.
3. Compiling all overtime slips with applicable back-up documentation and verifying accuracy of all labor charges prior to submittal to the Grants Manager for processing.
4. Maintaining ongoing communication with the grant advisor and the Granting Agency.

5. Submitting timely progress reports, as required by the Granting Agency, and providing a timely hard copy of all progress reports to the Grants Manager.
6. Preparing and submitting timely re-application(s) as funds are made available.
7. Advising the Grants Manager of any issues that arise in the grant program, whether they are programmatic, administrative, or financial.

B. The Grants Manager is responsible for:

1. Preparing a Grant file for each grant received which includes:
 - a. A brief summary of the grant program purpose, the Granting Agency, amount, project dates, grantor contact person, special conditions, reporting requirements, etc.;
 - b. A specific listing of the Grant Coordinator's responsibilities;
 - c. Progress reports prepared by the Grant Coordinator;
 - d. All documents generated by the grant, including the RFP/NFOA, proposal, award documents, completed City Council Resolution, etc.;
 - e. A calendar of all due dates for the duration of the grant; and,
 - f. An approved budget for the duration of the grant.

The Grants Manager shall store all documentation for the life of the grant in this file, and shall retain all files for a minimum of three years beyond the final grant closing date.

2. Providing the Grant Coordinator with necessary information and documents, and briefing the Grant Coordinator on grant management responsibilities.
3. Ongoing monitoring of administrative and financial grant details which include:
 - a. Reviewing all orders and expenditures for appropriateness, to include:
 - (1) The expenditure is in the approved grant budget;

- (2) It is a grantor-authorized expenditure;
- (3) It conforms to City, State and Federal requirements; and,
- (4) There are sufficient funds in the grant account to pay for the purchase:
 - (a) Signing approval and entering the assigned account numbers on the order.
 - (b) Forwarding the approved order documents to the assigned accounting staff for input into the SAP system.
 - (c) Preparing and submitting budget modifications to the Granting Agency and/or the Department of Finance, as necessary.

b. Communicating with the Grant Coordinator to ensure that all required reports are submitted in a timely manner.

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c. Communicating with the Department of Finance to ensure that all required financial reports are submitted in a timely manner.

NEW

d. Communicating with all other City administrative/financial support departments (e.g. Purchasing and Contracting, Department of Finance, City Treasurer, City Clerk), as needed.

e. Maintaining a calendar of critical dates, including grant expiration, renewal deadlines, etc.

f. Assisting the Grant Coordinator with administrative support, as needed.

g. Preparing financial reports and invoices for the Granting Agency.

h. **ALL GRANT EXPENDITURES ARE SUBJECT TO CITY REQUIREMENTS PERTAINING TO PERSONNEL, PURCHASING, OPEN BIDDING, ETC.** Grant funds are NOT exempt from any City regulations.

4. Preparing and Submitting Required Financial Reports

Both Federal and State granting agencies require award recipients to submit financial and programmatic reports. These reports describe the status of the funds or the project, compare actual accomplishments to

objectives, and provide other pertinent information. The specific requirements, reporting periods, and submission deadlines are identified within each agency’s respective grant guidelines.

a. With the exception of the final payment requests, projects are typically required to submit a report of expenditures and request for funds within 30 calendar days of the end of the report period, whether or not funds are being requested. The first three months of the grant period will typically be the first quarter and will typically correspond with the either the State or Federal fiscal year. The following are guidelines for reporting dates.

(1) State fiscal year – July 1-June 30

<u>Reporting Period</u>	<u>Report Due</u>
July 1 – September 30	October 30
October 1 – December 31	January 30
January 1 – March 30	April 30
April 1 – June 30	July 30

(2) Federal fiscal year – Oct 1 – Sept 30

<u>Reporting Period</u>	<u>Report Due</u>
October 1 – December 31	January 30
January 1 – March 30	April 30
April 1 – June 30	July 30
July 1 – September 30	October 30

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b. Federal reports must be submitted online through the Grants.gov and JustGrants systems. These modules will allow authorized users to view current and past programmatic and financial reports or amend the reports for the current quarter.

c. State reporting will be completed according to the Granting Agencies guidelines, using the appropriate forms and submittal process.

d. All financial reporting must be completed by the Grant Manager (or designee) prior to the due dates identified above.

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e. All financial reporting must be reviewed by the Department of Finance (or designee) prior to the due dates identified above.

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f. The Grants Manager will enter all financial information to the Grants.gov and JustGrants systems after receiving approval from the Department of Finance.

C. Grant Subcontracts

1. Frequently, grant programs require partnerships, services, expertise, products, etc., that are best provided by an entity other than the City. Examples include independent program evaluations, psychological counseling for program target individuals, language translation, and complex software development. In these cases, it is appropriate to subcontract with an individual, non-profit organization, private agency, or company.
2. Special attention should be placed to identify the appropriate contract mechanism to execute with an agency or contractor.
 - a. In the case of agreements with government agencies, a subaward will be issued.
 - b. In the case of an agreement with a non-profit agency, a Memorandum of Understanding (MOU) may be the appropriate agreement.
3. All competitive solicitation requirements of other City contracts and subcontracts apply to grant subcontracts.
4. Grants awarded by a federal agency must comply with 2 CFR 200 procurement guidelines.

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