DEPARTMENT OF CORRECTIONS

Policy Number: 104.110
Title: Incoming Grant Applications and Management
Effective Date: 5/19/20

PURPOSE: To ensure that all grant applications, awards, and other requests for external support are in the best interest of the department, meet statutory requirements, and are properly approved and administered through sound business practices and the guidelines developed by the Minnesota Office of Grants Management (OGM), Minnesota Management and Budget (MMB), and the United States Office of Management and Budget (OMB)..

APPLICABILITY: All funding requests for competitive financial assistance and other external resource support

DEFINITIONS:
Approval to Accept or Request Grant Funds form (attachment 104.110C) – a form that documents the approval to apply for a grant.

Financial services grant coordinator – staff person located in financial services division of DOC who is responsible for the coordination of all incoming grants to the agency.

Grant – a legal and binding document of financial assistance via a third party to an eligible recipient to carry out a public purpose.

Grant application – a document written by a project director requesting external funding resources or support.

Grant award – official confirmation of funding received from the grantor for a specific purpose after the application is submitted.

Indirect costs – administrative support costs incurred within the agency that are recoverable to the grant.

Project director – DOC staff person applying for and managing a project supported by external funds.

Special conditions – federal award notices that include conditions that are specific to the funding program, the statutory authority for the funding program, and/or other federal regulations.

Standard Assurances (OMB attachment 1121-0140) – a set of legal obligations contingent on acceptance of federal financial assistance.

PROCEDURES:
A. Initial Grant Applications
   1. All grant applications related to or sponsored by the department must be submitted to the DOC financial services unit and approved by administration prior to submission to any funding source. All funding requests for competitive financial assistance and other external resource support must be approved by financial services prior to applying for any funding request.

2. Upon identification of a grant opportunity, or other opportunity for external support, a project director must be identified. The project director obtains approval from their supervisor, warden (if applicable), and activity budget manager, documented with signatures on the Approval to Accept or Request Grant Funds form (attached).

3. The project director identifies sources of matching funds, if required, and consults with financial services staff. The financial services grant coordinator reviews the appropriateness and competitiveness of the project for the funding opportunity, and facilitates the Approval to Accept or Request Grant Funds form approval process.

4. If required, the financial services grant coordinator must prepare for submission a Federal Funds Review Request, Minnesota Management and Budget (MMB) form 7250-01 (link attached) for submission to the MMB executive budget officer in compliance with Minn. Stat. § 3.30.

5. The financial services grant coordinator and designated accounting staff review final application documents prior to submission. The financial services grants coordinator submits the application package to the funding agency and manages the required electronic application processes, including grants.gov and central contract registry. Copies of the submitted proposals are retained in financial services.

B. Awards

1. Federal assistance must be used only for the purpose for which the money is received.

2. Upon receipt of an award notice, the financial services grant coordinator, project director, and appropriate financial services staff consult to verify the ability of the agency to accept the funds and respond to special conditions.

3. The financial services grant coordinator obtains authorizing signatures, submits the acceptance documents, and retains copies of the documents in financial services grant files. Upon acceptance, the project director provides the director of communications and the appropriate deputy commissioner with a summary of the project and the award.

4. The financial services grant coordinator verifies legislative approval to expend the grant funds and notifies the project director when spending may begin. Financial services staff also obtain the funding string (a multipart code that provides full funding information).

5. The project director assumes responsibility for meeting project objectives, managing the program budget, and submitting timely progress reports.

C. Project Monitoring and Grant Revisions

Federal grant awards require an internal grant monitoring process. Financial services staff provide financial reports and support to project staff, and access to federal and state grant management systems to assure security, accuracy, and timeliness of financial and programmatic reporting.

D. Award Revisions

The project director reviews any post-award changes with the financial services grant coordinator and the accounting staff prior to submission to the funding agency. Any post award changes to the project activities or budget must be communicated by project staff to the financial services grant

coordinator and documented in grant files. Revision documents are retained in financial services grant files.

E. Financial Reporting
Financial services accounting staff are responsible for completion of the quarterly Financial Status Reports (FSR). Indirect cost must be calculated and expenditures must be reported, which determine the appropriate draw of funds from the grant on a reimbursement basis.

F. Project Direction
The project director is responsible for developing and managing the programmatic aspects of the project.

1. Project development responsibilities include such examples as:
   a) Establishing a project team;
   b) Leading the team in project vision and design;
   c) Engaging the project planning team and participating as a member of the team;
   d) Identifying sources of matching funds;
   e) Cultivating project partnerships; and
   f) Requesting volunteers to review the application prior to submission.

2. Project management responsibilities include such examples as:
   a) Assuring project goals and objectives are achieved;
   b) Assuring all federal regulations and award conditions are met;
   c) Administering the project budget and document matching funds;
   d) Arranging for a project evaluation consultant;
   e) Recruiting and coordinating the project advisory team;
   f) Maintaining communication with technical assistance providers; and
   g) Writing and submitting timely project narrative and other required reports.

G. Accountability

1. DOC notifies appropriate state and/or federal agencies, regulatory and law enforcement authorities, and/or the Office of the Legislative Auditor (OLA), as applicable, of suspected violations of law and/or instances of fraud and abuse.

2. DOC takes appropriate action, as applicable, against any employee found to be in violation of the requirements of this policy, the Code of Federal Regulations (CFR), or any other personal conduct or ethics-related policies.

INTERNAL CONTROLS:

A. Copies of all original grant applications, award acceptance documents, FSRs, Approval to Accept of Request Grant Funds forms, and revision documents are retained in financial services grant files.

B DOC notifies appropriate state and/or federal agencies, regulatory and law enforcement authorities, and/or the Office of the Legislative Auditor (OLA), as applicable, of suspected violations of law and/or instances of fraud and abuse. DOC takes appropriate action, as applicable, against any employee found to be in violation of the requirements of this policy, the Code of Federal Regulations (CFR), or any other personal conduct or ethics-related policies.

ACA STANDARDS: None

REFERENCES: Minn. Stat. §§ 3.30, Legislative Advisory Commission; 3.3005, Federal Money; Expenditure Review; 16A.127, Indirect Costs; and 241.01, subd. 5a, Acceptance of gifts, grants and subsidies; purposes
Minnesota Management and Budget, Statewide Financial Policies, "Grants, Projects, and Jobs," Ch. 4
Minnesota Management and Budget Statewide Operating Policy – Federal Funds (MMB Policy 0303-01)
Policy 103.220, "Personal Code of Conduct of Employees"
Policy 104.252, "Code of Conduct for Employees with Auditing, Purchasing, Financial Reporting, or Tax Filing Duties"

REPLACES: Policy 104.110, "Incoming Grant Applications and Management," 9/4/18.
All facility policies, memos, or other communications whether verbal, written, or transmitted by electronic means regarding this topic.

ATTACHMENTS: Legislative Advisory Commission Approval (104.110B)
Approval to Accept or Request Grant Funds (104.110C)
Federal Funding Accountability and Transparency Act Reporting Procedure (FFATA) (104.110D)
Standard Assurances (federal Office of Justice Programs document, OMB 1121-0140)

APPROVALS:
Deputy Commissioner, Community Services
Deputy Commissioner, Facility Services
Assistant Commissioner, Operations Support
Assistant Commissioner, Strategic Planning, Implementation, and Employee Development
Assistant Commissioner, Criminal Justice Policy, Research, and Performance