
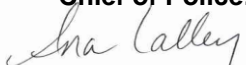
	ELGIN POLICE DEPARTMENT 151 Douglas Avenue Elgin, Illinois 60120	
Effective Date: 11/14/19	STANDARD OPERATING PROCEDURE	Revised Date: 00/00/00
Chief of Police: 	Grant Management 17.3	
Cross Reference: City of Elgin Internal Control Documentation 30 ILCS 708/1 Illinois Grant Accountability & Transparency Act 50 ILCS 205/ Illinois Local Records Act		Policy Sections: 17.3.1 Approval Needed to Apply for a Grant 17.3.2 Grant Application Process 17.3.3 Grant Manager Responsibilities 17.3.4 Equipment 17.3.5 Collaboration with the Finance Department 17.3.6 Restrictions and Other Provisions 17.3.7 Storage Retention Period of Grant Documentation

PURPOSE

The purpose of this policy is to provide guidelines for initiating grant applications, assigning responsibilities, employee accountability, oversight of payroll and timekeeping activities, and ensuring required grant reporting procedures are followed.

POLICY

It is the policy of the Elgin Police Department to use awarded grant funds as a means to assist in financially supporting programs, equipment, and/or personnel essential to fulfilling overall department goals and objectives. The department may apply for grants to fund the implementation of new programs, supplement existing programs or purchase new equipment. Grant funds are awarded for a specific public purpose; therefore, programs, equipment, and expenditures shall be properly managed to ensure compliance to the provisions outlined in the grant agreement. All employees who perform work under a grant are responsible for the accurate accounting of work hours in connection to the grant funded program. Furthermore, all applicable grant guidelines and procedures shall be strictly adhered to.

DEFINITIONS

Grant: The award of funds to the police department for the purpose of providing supplemental services, equipment or programs. Grants are generally provided by federal, state, and local governments, and by private corporations, foundations, and service organizations.

Grant Manager: A supervisor who possesses staff management authority and has the primary responsibility for the pursuit of, application for, and overall administration of a grant. This is tasked to an employee who is responsible for the overall operation of a specific grant funded project.

PROCEDURES

17.3.1 APPROVAL NEEDED TO APPLY FOR A GRANT

- A. Employees shall not seek grant funding, submit an application for a grant, participate in a grant program, or commit the department to a grant program without the prior approval of their chain of command and final approval by the chief of police.
- B. Employees seeking grant funding or who learns that the department has been made eligible for grant funding shall submit information on the grant through their chain of command. Information may include, but is not limited to the following:
 1. Grant announcement, if available.
 2. Grant application and instructions, if available.
 3. Objective of grant.

4. Funding Source, i.e. announcement, solicitation, legislation, legislative contact, etc.
 5. Substantive elements of the program such as:
 - a. Resources required.
 - b. Department workgroups involved.
 - c. Matching funds or matching resources required.
 - d. Identity of subcontractors involved (other agencies, private or nonprofit organizations, etc.)
 6. If the grantor is a private organization such as a corporation, foundation or service organization, the results of the vetting process. The vetting process ensures that there are no conflicts of interests, such as a close familial, business or other associated relationship.
- C. If it is determined that the department will apply for the grant, the respective command staff member will assign a supervisor to serve as the grant manager.
- D. If the grant is awarded to the police department and prior to the execution of the grant, the commander responsible for the division that applied for the grant will ensure the:
1. Legal Department's review of the relevant documents.
 2. Preparation of the Committee of the Whole memo (COW).
 3. Inclusion of the grant on the city council agenda to seek council's approval on the grant agreement and associated funding.

17.3.2 GRANT APPLICATION PROCESS

- A. The grant manager shall ensure the development of the grant application to ensure the following is completed, as applicable to the grant being sought:
1. The application addresses the allowable needs of the department.
 2. The application meets the requirements and format of the grantor and ensures that the fiscal requirements of the grantor and the City of Elgin are satisfied without conflict. This will generally require collaboration with the city's Legal Department and Finance Department.
 3. The department has identified whether any federal and state statutes correspond to the grant.
 4. The application is properly completed prior to being submitted to the chief of police or designee for review and approval.
 5. The grant proposal is processed and submitted to the grantor on a timely basis.
 6. Application guidelines and terms are complied with.
 7. Progress reports are reviewed for accuracy and compliance with funding guidelines, and are submitted to the grantor on time.

8. Upon receipt of the completed fiscal cost report and reimbursement voucher, they are forwarded to the grantor.
- B. The grant manager may delegate tasks to employees having involvement with the program or equipment being sought or those involved with fiscal matters.

17.3.3 GRANT MANAGER RESPONSIBILITIES

- A. The grant manager has the ultimate responsibility for the grant and has ongoing responsibilities for the duration of the grant or until the grant manager duties are assigned to another supervisor. The grant manager may delegate tasks to employees who have job functions associated with the grant.
- B. The grant manager's responsibilities depend on the requirements of the grant and as applicable, is responsible for ensuring the:
 1. Timely submission of fiscal and operational status reports.
 2. Scheduling and tracking work performed in connection to the grant.
 - a. Productivity/activities of those performing grant related work.
 - b. Ensuring work performed is signed-off by a supervisor or employee acting in the capacity of a supervisor.
 - c. Maintenance of timekeeping/timesheets to document work performed under the grant.
 1. Personnel who perform grant related job functions on a part-time basis, in addition to their regular job duties, shall document their time on the department authorized timesheet or overtime report form which designates the name of the grant and/or the project number associated with their work hours.
 2. Personnel who spend 100% of their time working under a grant shall document their hours on the department authorized timesheet. The grant manager shall ensure the hours documented on the timesheet reconcile with the employee's attendance.
 3. All timesheets and/or overtime slips reflecting grant funded work hours shall be reviewed by the grant manager or designated supervisor prior to submission to payroll.
 3. Requests for grant extensions.
 4. Organization and maintenance of operational records such as services provided, utilization of equipment, statistics, community partnerships, agreements and other grant management documents.
 5. Organization and maintenance of fiscal records that govern grant program delivery, including, but not limited to:
 - a. Quality assurance reporting.
 - b. Unit cost and expense analysis and management.
 - c. When applicable, compliance with accreditation standards and licensing requirements specified by the entity providing the grant funding.

- d. Performance measurements are tied to financial data, e.g. number of arrests or citations, compared to funding.
 - e. Providing budget data, e.g. salary, fringe, personnel and equipment costs.
 - f. Generating purchase orders in conjunction with the applicable city departments.
 - g. Ensuring accurate invoicing which includes a secondary review process by another employee.
 - h. Ensuring that monies are expended on reasonable, necessary, and prudent grant related purchases.
 - i. Ensuring that department revenue and expenditure records balance with Finance Department records.
 - j. Budget modifications.
- C. As applicable, the grant manager shall also ensure that:
- a. Changes in the eligibility of the police department to participate in a grant are reported to the grantor in writing, either on grantor forms or police department letterhead.
 - b. The department obtains written approval from the grantor when key personnel change or the funding scope changes during any grant. Notification to the grantor shall be in writing either on grantor forms or police department letterhead.

17.3.4 EQUIPMENT

- A. In accordance to the respective grant agreement, any equipment purchased with grant funds shall be inventoried and maintained for the length of time outlined in the agreement.
- B. Equipment shall be used solely for the purpose of carrying out grant related activities, in accordance with the grant agreement.
- C. All damage to equipment shall be documented and maintained with grant records.

17.3.5 COLLABORATION WITH THE FINANCE DEPARTMENT

Pursuant to City of Elgin internal control documentation procedures, the city's Finance Department monitors the progress of all grants received by the city. This entails periodically reviewing the status of projects and assessing reporting and compliance.

- A. In order to properly execute the monitoring process, the grant manager forwards the following grant documentation to the Finance Department:
 - 1. Copy of the Council of the Whole Memo, with a copy of the grant application – *upon council approval.*
 - 2. Copy of the City Council Resolution with a copy of the executed grant agreement received from the granting agency – *upon council approval.*
 - 3. Copy of any executed grant amendments, extensions, modifications, etc – *prior to submission to granting agency.*
 - 4. Spreadsheet summarizing grant expenditures, along with supporting documentation – *in accordance to the provisions set forth in the grant agreement.*

5. Copy of all intermittent filings required by terms of grant agreement – *upon submission to granting authority.*
 6. Copy of all requests for reimbursement, along with supporting documentation – *upon submission to granting authority.*
 7. Granting agency reimbursement check, if received by the grant manager. This is accomplished through the budget analyst.
- B. The Finance Department maintains a record of and applies for the creation/renewal of grant identification such as the Catalog of Federal Domestic Assistance (CFDA) title, cage and duns numbers.
- C. The budget analyst and/or grant manager may elect to hold periodic meetings on the status of the grant; this may also occur at the request of the Finance Department.
- D. The grant manager shall work with the budget analyst and/or the Finance Department to ensure all financial reporting obligations are met, including compliance with the Illinois Grant Accountability and Transparency Act, 30 ILCS 708/1, as applicable.

17.3.6 RESTRICTIONS AND OTHER PROVISIONS

- A. Employees participating in a grant shall:
1. Use grant funds, property, or other assets for their intended and authorized purpose and shall be safeguarded from any unintentional use or disposition. This is accomplished through a collaboration with the grant manager, respective commander, budget analyst and Finance Department.
 2. Report any real or perceived conflict of interest related to the selection, award, or administration of grants through the chain of command. A conflict of interest occurs when an individual's private interests might reasonably be construed to affect his or her independent, unbiased judgement, or there is potential for improper personal gain or influence, in applying for, conducting, managing, or reporting on any grant.
 3. Report any instances of grant fraud, waste, or abuse to their immediate supervisor. Fraud, waste, and abuse may be investigated in accordance with the applicable Standard Operating Procedures.
 4. Follow existing protocol pertaining to complaints or grievances related to the administration of grants in accordance with applicable collective bargaining agreements, department policies, or City of Elgin procedures.
 5. Cooperate with the authorized grant auditor. Grants may be subject to an independent audit by the Finance Department, auditing officials retained by the City, and/or audits by the granting authority, in addition to any audit deemed reasonable and necessary by the chief of police.
- B. Employees participating in a grant shall not:
1. Carry out any form of discrimination or disparate treatment pertaining to the selection, award, or administration of grants.
 2. Cause action which may result in, or create the appearance of preferential treatment of any person, use of his or her official position for private gain, or any other action adversely affecting the confidence of the public and integrity of the police department.
 3. Falsify any grant applications, documentation, or financial reporting of grants.

17.3.7 STORAGE RETENTION PERIOD OF GRANT DOCUMENTATION

All relevant grant documentation, including applications, records of services, performance, and goods delivered, and financial reports, will be retained for a minimum of three (3) years from the grant's closing date, or otherwise in accordance with the Illinois Local Records Act (50 ILCS 205/).