

# YOUTH SERVICES POLICY

<b>Title:</b> Grants Coordination and Management Program	<b>Type:</b> A. Administrative <b>Sub Type:</b> 3. Fiscal <b>Number:</b> A.3.6
<b>Page 1 of 11</b>	
<b>References:</b> United States CFR ( <i>Code of Federal Regulations</i> ) Title 2, Part 200; Title 28 CFR, Part 70; Title 28 CFR, Part 83; Title 41 CFR, Part 301; <i>DOJ Grants Financial Guide: DOJ Guide to Procurement Procedures</i> ; LAC Title 34; LA Revised Statutes 39:1481 – 1526; LA Revised Statutes 39:78; YS Policy No A.1.9, “Records Management and Retention”	
<b>STATUS: Approved</b>	
<b>Approved By:</b> <i>James Bueche, Ph.D., Deputy Secretary</i>	<b>Date of Approval:</b> 02/22/2019

## I. AUTHORITY:

Deputy Secretary of Youth Services (YS) as contained in La. R.S. 36:405. Deviation from this policy must be approved by the Deputy Secretary.

## II. PURPOSE:

To set policy and outline the procedures for the coordination and management of grant activities within Youth Services (YS). Said purpose excludes Title I and Title II grants from the US Department of Education, which are administered by OJJ’s Education Department, according to the regulations set forth in Title I, Title II, and 2 CFR Part 220.

## III. APPLICABILITY:

Deputy Secretary, Assistant Secretary, Undersecretary, Chief of Operations, Executive Management Advisor, Regional Directors, Facility Directors, Regional Managers, and all employees authorized by the Unit Head to make grant applications.

## IV. DEFINITIONS:

**Grants Coordinator** – A Central Office (CO) employee, who is assigned to Continuous Quality Improvement Services (CQIS) and charged with the responsibility of seeking out supplementary revenue in the form of public and private grants. This person is also responsible for providing oversight of the entire grant-writing and grants-management process.

**Continuous Quality Improvement Services (CQIS)** - The CO performance- based and results-driven competency and efficiency management system.

**Grant** - A subsidy for state general funds received from a source outside of YS for the purpose of establishing (or continuing) a specific project.

**Grant Writer** – A unit staff member charged with compiling application materials and writing the application, or parts of it, to be submitted to the Grants Coordinator for final submission.

**Grantee** - A budget unit that receives grant funds.

**Grantor** - Agency public or private, from which grant funds are received.

**Project Manager** – A unit staff member appointed to act as liaison between the Grants Coordinator and all employees, contractors, and subgrantees responsible for operating a particular grant-funded project. This person is responsible for running the day-to-day operations of that project.

**Proposal** – An application for grant funding.

**Subaward** – A contract with a Subgrantee.

**Subgrantee or Subrecipient** – A special term used by Office of Justice Programs to mean an outside entity that the primary Grantee has contracted to carry out part of a federal grant award, as distinguished from an organization that was procured to provide goods. The term is only required when a federal award is the primary source of funding. Subgrantees, as subrecipients of grant money, are subject to the same grant regulations as OJJ, and to a set of monitoring rules that exist separate from and in addition to OJJ's contract-monitoring policies.

**Unit Head** – Deputy Secretary, Facility Directors and Regional Managers.

## V. POLICY:

It is the Deputy Secretary's policy that all grants, except Title I and Title II, shall be administered through the Grants Coordinator in accordance with applicable state and federal laws.

## VI. DUTIES AND RESPONSIBILITIES

A. The Grants Coordinator shall be responsible for the following:

1. Overseeing all grant activities, except those originating from Title I and Title II monies, which fall under the management of the Education Department;

- a. The Grants Coordinator may have a Project Manager working on his or her behalf for larger projects; or the Grants Coordinator may work as his or her own Project Manager;
2. Seeking and securing grant funding for OJJ;
3. Writing grant proposals and submitting them;
4. Maintaining relationships with Grantors;
5. Working with grant supervisors or technical-assistance personnel from granting agencies;
6. Updating OJJ profiles in federal, state, or non-profit grants-management systems;
7. Keeping OJJ in compliance with all federal and state laws and regulations governing grant finances, contracting, programming, and civil rights;
  - a. Keeping on file updated copies of all Louisiana laws and regulations governing contracts and purchasing procedures, which are: LA R.S. 39:1481 – 1526; LAC Title 34;
  - b. Keeping on file all federal OMB circulars that govern proper spending, contracting, purchasing, and audits— Title 2 CFR, Part 200;
  - c. Keeping on file the latest version of the Office of Justice Programs' *DOJ Grants Financial Guide* and the US DOJ's *Guide to Procurement Procedures*.
8. Initiating grant-related contracts with individuals or organizations;
9. Planning all fiscal activities with the assigned Budget Analyst from the Department of Public Safety's Office of Management and Finance, including:
  - a. The tracking of all monies spent and the allocation of said monies to the appropriate grants;
  - b. Due dates of all fiscal reports submitted to funding agencies;
  - c. The tracking of employee salaries, benefits, and time keeping;
  - d. The keeping of 156-Bs, purchase orders, receipts, invoices, packing slips, and any other documents that can serve as back-up for purchases made or invoices paid;
  - e. The paying of all invoices from vendors, contractors, or subgrantees;
  - f. The updating of budget-to-actuals charts when necessary;

10. Purchasing (or assisting a Project Manager in purchasing) equipment and supplies associated with grant goals;
  11. Organizing and running the day-to-day operations of grants with reasonable progress toward goals;
  12. Supervising and coordinating the work of staff members who have grant-related responsibilities;
  13. Monitoring and coordinating the work of any contract consultants.
- B. The Project Manager, if a different individual from the Grants Coordinator, shall be responsible for:
1. Following the guidance of the Grants Coordinator and absorbing items 10 through 13 in the section above;

## **VII. GRANT APPLICATION PROCEDURES:**

- A. Proposal Writing, Phase I: Planning
1. This phase shall take place when an employee of OJJ brings an idea for a grant proposal to the attention of the Grants Coordinator. The Grants Coordinator becomes the Chief Writer and organizer of proposal-writing efforts at this time. His or her first task is to examine the application and proposal instructions and determine whether or not a proposal can be written that reasonably seeks a solution to OJJ's needs. If so, the next steps are as follows:
    - a. Seek permission to apply for the grant from the Chief of Operations and Undersecretary; this request should include a brief summary of the proposed program and specific reference to the amount of money being applied for, as well as the match responsibility;
    - b. After receiving permission, the Grants Coordinator and Chief of Operations shall, if necessary, choose a Project Manager who would be best qualified to lead the project, if it is funded; this employee must come from inside the department that will benefit most from the grant;
    - c. A mandatory meeting shall be held at least 3 weeks prior to the application due date; during this meeting, the Grants Coordinator will:
      - i. Facilitate a conversation that outlines the intended argument of the application;
      - ii. If necessary, enlist the help of the Project Manager to write parts of the proposal, so that the appropriate expertise is inserted into the application;

- iii. Assign roles to others involved in the proposal process, such as Contributing Writer, Gatherer of commitment letters, Budget Preparer, Logic Model Preparer, etc.;
- iv. Ensure that all persons involved fill out and sign the “Assigned Roles for Grant Application Process” [*Please use Attachment A.3.6 (a)*].

**B. Proposal Writing, Phase II: Composition**

1. This phase is the actual writing of the grant application. All employees assigned to hand in writings or other contributions to the proposal’s final draft shall respond to requests from the Grants Coordinator on or before the due dates. The Grants Coordinator will then ensure that all parts of the proposal are inserted into the application.
2. The proposal shall be a neat, well-written, error-free argument that follows the format instructions given by the grantor. It should contain:
  - a. Completed forms or cover sheets required by the grantor;
  - b. An enumeration of OJJ’s needs;
  - c. An explanation of how grant money can meet said needs;
  - d. A plan showing how grant money will be spent;
  - e. Conclusions or predicted outcomes showing how OJJ’s position will be changed for the better after grant monies have been spent; and
  - f. All addenda, pictures, charts, graphs, abstracts, timelines, signed documents, statements, budget worksheets, etc. that the grantor calls for in the proposal instructions.

**C. Proposal Writing, Phase III: Submission**

1. The Grants Coordinator shall compile and complete a final edit of all application parts and submit the finished grant proposal. In most cases, the Grantor will require electronic submissions, which will necessitate use of a computer and reliable internet access. In order to overcome delays caused by computer problems, glitches in the grantor’s website, or other unforeseen circumstances, the Grants Coordinator shall begin the submitting process two (2) days in advance of the due date.

In a few cases, the granting agency will require hard-copy, printed applications to be mailed. If so, the Grants Coordinator shall mail the completed application at least two (2) days before the due date, using overnight priority and requiring signature upon delivery.

2. Grants shall be applied for under the name of the Chief of Operations, who shall ultimately be responsible for any major decisions in the completion of the grant process, should it be funded. The Chief of Operations becomes the legal signer when the application is submitted.

**VIII. GRANT AWARDS AND PROGRAMS:**

- A. If OJJ receives an award, the Grants Coordinator shall inform the applying unit of the notification and seek permission from both the Chief of Operations and the Undersecretary to begin the grant.
- B. The Grants Coordinator shall oversee the implementation of grant activities, both financial and programmatic.
- C. The Project Manager shall ensure all day-to-day activities are completed effectively and on time. The Project Manager shall also ensure that all OJJ staff and contracted personnel complete their tasks on time.
- D. The Project Manager shall report all progress or problems to, and consult with, the Grants Coordinator in making changes to programming or scheduling.
- E. The Project Manager and the Grants Coordinator shall identify positions in the Table of Organization (T.O.) necessary for the grant, and shall request any positions needed through the Human Resources Department of the Office of Management and Finance.
- F. The Project Manager shall keep copies of PARs (personal activity reports). All personnel who have been assigned roles and salary percentages to grants (except for those assigned 100% to a single grant), whether in match funding or federal funding, shall maintain and complete a PAR (personal activity report) every pay period. Unlike employee time sheets, there is no need to make sure that PARs add up to 80 hours every two weeks; PARs shall *only* reflect work done on grants. [*Please use attachment A.3.6 (b)*]. Each PAR will:
  - 1. Comply with federal OMB 2 CFR, Part 225 for the purpose of tracking how much work has been done on each grant project by each employee;
  - 2. Be submitted to the Grants Coordinator at the same time that time sheets are due; this activity shall continue until respective grants have expired;
  - 3. Contain a minimum of information that includes, hours worked, days worked, separation by grant, and totals for every two-week period;
  - 4. Include actual hours worked, not an average, estimated, or evenly divided breakdown per time period;
  - 5. Be signed by the employee;
  - 6. Act only as a supplement to the employee's timesheet, not take the place of it;

7. Not contradict the employee's time sheet; all employees shall take care to make sure that work done on grants is not recorded while the employee was on leave.

**G. Contracts and Subawards:**

The Grants Coordinator and Project Manager shall determine if professional services or consulting contracts are necessary. If so, they will request contracts in the following ways:

1. If an RFP is necessary for initiating a contract, the Grants Coordinator will submit the RFP draft to the Office of State Procurement for processing. The Grants Coordinator will keep all records of the process from initiation through the judging and scoring of the RFP, and through to the awarding of the contract.
2. If an RFP is necessary, but there is only one possible vendor, then the Grants Coordinator must submit a sole source letter and application to all agencies involved in arbitrating the grant award. The sole source letter must be impeccably and robustly supported with details and explanations as to why this course of action is necessary.
3. If an RFP is not necessary because the minimum threshold of cash value per fiscal year will not be met, the Grants Coordinator will proceed to the next step.
4. The Grants Coordinator shall formally request the contract through OSP according to that office's guidelines for contracting. This shall be completed by a clerical staff member who has expertise in submitting documents through the appropriate systems. At a minimum, the Grants Coordinator and Project Manager shall keep in communication with this staff member, regarding timeliness of the process, changes that may be needed, and documents which must be submitted.

**H. Monitoring a Subgrantee and Managing Risk Level:**

In addition to attending meetings, participating in phone conferences, or other grant-related activities, Subgrantees must also submit progress reports and receive formal monitoring visits.

1. Subgrantees shall submit progress reports enumerating completed program activities. These reports shall be turned in at the same time that invoices are due and may be attached thereunto.
2. The Project Manager will conduct formal monitoring visits, designed to evaluate for basic compliance, readiness for grant activities, and possible level of risk. The Project Manager shall bring the attached checklist to these visits. [*Please use attachment A.3.6 (c)*].

3. Monitoring Report: The Project Manager shall write a brief report summarizing the monitoring visit, the first of which shall take place within 30 days of contract execution. He or she shall include mention of a risk level and the above checklist as an attachment. The risk level can be determined by the Grants Coordinator's giving one point each for these commonly recognized risk factors:
  - a. Poor performance on previous awards;
  - b. Negative remarks on the most recent audit;
  - c. Recent substantial changes in personnel or systems;
  - d. The Subgrantee has existed for less than 2 years;
  - e. The date of OJJ's last site visit or monitoring visit of the Subrecipient was more than one year ago;
  - f. Subrecipient was not aware that it must comply with the same federal and state laws and regulations as OJJ;
  - g. Significant doubts about whether the Subgrantee will be able to complete goals, objectives, or deliverables on time;
  - h. Past invoicing practices are unclear; calculations or backup to justify billing is insufficient;
  - i. Subgrantee's budget or programmatic plans are not detailed enough.
4. A score of 7-9 is high risk; a score of 4-6 is moderate risk; and a score of 0-3 is low risk. The project manager will use these risk levels as a guide for the frequency of subsequent site visits:
  - a. For high-risk Subgrantees, every two months;
  - b. For moderate-risk Subgrantees, every quarter;
  - c. For low-risk, every six months.
5. Corrective Action: For issues found, the Grants Coordinator and Project Manager shall assist the Subgrantee in a corrective action plan, while explaining that the common goal should be to help the Subgrantee improve in terms of grant-related performance and compliance; *monitoring should never be about punishing the Subgrantee.* The corrective action plan shall include any or all of the following elements, depending on which are necessary:
  - a. A timeline that represents a revised schedule of events designed to steer the Subgrantee toward compliance with state and federal laws and regulations governing grant expenditures, as well as, contract requirements;
    - i. If the correction is administrative, the timeline should specifically reference due dates for documents to be turned in or employees to be replaced or properly trained;
    - ii. If the correction is fiscal, the timeline should specifically reference due dates for invoices to have a renewed format, charges to be explained, cost center codes to be clarified, etc.;

- iii. If the correction is programmatic, the timeline should specifically reference due dates for the Subgrantee to correct processes, speed up productivity, or increase the percentage of deliverables in the midst of completion.
  - b. If necessary, a request for technical assistance from the Grantor or the Grantor's representative advisor;
  - c. If necessary, alterations to the Subgrantee's contract;
  - d. If necessary, a GAN (grant adjustment notification) to the Bureau of Justice Assistance requesting a no-cost extension because OJJ and the Subgrantee have to solve the issues cited in the monitoring report.
- I. Coordination of Finances:
  1. Grant funds are subject to the same policies as general funds and must be expended and accounted for through utilization of La. R.S. 39:78, which describes appropriate accounting principles.
  2. The Project Manager shall review contract or Subgrantee invoices, approve as appropriate, and forward the invoices to the Office of Management and Finance for payment using the email procedure. The subject line of each payment email shall contain the invoice month, the contract number, the name of the contractor, and the grant number on which the payment should be charged. The CC line of the email must include the Budget Analyst. If any aspects of the invoices are insufficient or incorrect:
    - a. The Grants Coordinator should subtract from or add to the current invoice with a written note to document the alteration; or
    - b. Ask the Subgrantee to make any needed corrections to the invoice immediately.
  3. The Budget Analyst shall request the drawdown of grant funds from the grantor agency and submit fiscal reports.
  4. The Grants Coordinator shall check with the Budget Analyst once every seven (7) days to ensure that all purchases, contract payments, personnel expenditures, and other grant-related costs are being reimbursed by and drawn down from the correct grant funds.
  5. The Project Manager will order all supplies and equipment; this person will also keep all records of said purchases from the outset of the order through to delivery of the items. This includes, but is not limited to, purchase orders, 156-Bs, quotes, correspondence with the seller, receipts, copies of the payment from OJJ's book-keeping program, and packing slips. The Project Manager will immediately forward all copies of these kinds of paperwork to the Grants Coordinator.

- J. The Grants Coordinator shall keep copies of all documents, pertaining to all grant proceedings, for at least 3 years after the last closing date of each grant.

**IX. GRANT REPORTING:**

The Grants Coordinator shall:

- A. Follow all regulations, guidelines, and due dates regarding reports to grantors.
- B. Notify the Project Manager and Budget Analyst in advance of required program and financial reports, including their respective due dates.
- C. Complete or oversee the completion of:
  - 1. Periodic program reports, which are generally assigned by the Grantor and serve the purpose of summarizing grant activities and tasks completed; these reports are usually due once per quarter.
  - 2. Periodic fiscal reports, which will be completed by the Budget Analyst; the Grants Coordinator shall meet with the Budget Analyst to ensure that the grant fiscal records are reconciled to the Integrated Statewide Information System - Advantage Financial System (ISIS-AFS) reports. The Grantor will specify deadlines and provide the format for these kinds of reports.
  - 3. Subgrantee monitoring reports, which will be written after each monitoring visit or desk review and filed within 14 days; the checklist and instructions for this report are included in Section VIII.H.2-3 above.
  - 4. A fiscal year-end report, which is due to the Chief of Operations and the Undersecretary on or before August 31<sup>st</sup> of each year; the primary purpose of this report is to show a summary of grant expenses on each grant during the fiscal year only; thus all grants, whether they remain open or were closed during the fiscal year, should be included; the report shall contain a summary of:
    - a. Expenditures on contracts for each grant (whether closed or active) for the ending fiscal year;
    - b. Expenditures on salaries for each grant (whether closed or active) for the ending fiscal year;
    - c. Expenditures on equipment and supplies for each grant (whether closed or active) for the ending fiscal year;
    - d. Any other expenditures for each grant (whether closed or active) for the ending fiscal year.
  - 5. A close-out summary of programmatic activities, which can be distinguished from other reports by the fact that it summarizes all activities of a single grant at the time of shut-down; this kind of report is not periodic. See the full instructions for this report in Section X.C below.

## **X. GRANT CLOSE-OUT**

The Grants Coordinator shall:

- A. Check with all employees involved in grant activities to make sure they are on track to complete tasks and meet objectives on or before the last day that the grant will be considered active. If not, the Grants Coordinator must implement corrective actions, which, if delays are serious enough, might include an application for a no-cost extension.
- B. Compose a close-out timeline, which clearly shows the span of time between the last date of the active grant and the last date that the grantor has asked that all close-out operations be completed. All 156-Bs, purchase orders, and invoices must be dated on or before the last date of the active grant, *not* the close-out period. At minimum, this timeline must include:
  1. The last week of grant activities, while the grant is still active;
  2. The first and last dates of the close-out period;
  3. A clear description of each employee's close-out tasks, including due dates;
  4. A clear reminder and completion date of any reports that are due during the close-out period.
- C. Prepare an internal, close-out summary of programmatic activities completed throughout the entirety of the grant period. The report should be turned in to Chief of Operations no more than 60 days after close-out, and should include:
  1. Enrollment totals;
  2. Completion percentages with regard to performance measures, indicators, goals, and objectives;
  3. A description of completed contract activities;
  4. Other completed activities or corrective actions;
  5. A summary of all funds spent to date;
  6. A copy of any and all reports that were submitted by evaluating contractors, consultants or auditors, including a description of how OJJ and its assigned employees chose to address those reports.
  7. A brief note on whether or not the contractor's work was satisfactory.

**Previous Regulation/Policy Number:** A.3.6

**Previous Effective Date:** 02/14/2018

**Attachments/References:** A.3.6 (a) Assigned Roles Grant Application Process.Feb2018.docx  
A.3.6 (b) Personal Activity Report Biweekly.Feb2019.docx  
A.3.6 (c) OJJ Checklist for Monitoring Subgrantees.Feb2018.docx

**ASSIGNED ROLES for the GRANT APPLICATION PROCESS**

Grant Title:  
CFDA #:

Grant #:  
Funding Opportunity #:

In the spaces below, the Grants Coordinator shall designate the role of each staff member contributing to the proposal. The employee should be given a descriptive job, such as chief writer, contributing writer, researcher, collector of support letters, budget preparer, logic model designer, etc. The due dates for staff contributions should be several days before the grant application is to be submitted.

Assigned Employee: \_\_\_\_\_ Role: \_\_\_\_\_ Due Date: \_\_\_\_\_

Comments: \_\_\_\_\_

\_\_\_\_\_

Signature of Grants Coordinator \_\_\_\_\_ Date: \_\_\_\_\_

Personal Activity Report, Bi-weekly							Name:
<u>Day of the Week</u>	<u>Date</u>	BVP	Emgcy Mgmt	SCA Tech 2	JAG		
Monday							
Tuesday							
Wednesday							
Thursday							
Friday							
Saturday							
Sunday							
Monday							
Tuesday							
Wednesday							
Thursday							
Friday							
Saturday							
Sunday							
<u>Total Hours per grant</u>							
<u>Total Wages per grant</u>							
<u>Signature of employee</u>		<u>Date</u>					

<b>Office of Juvenile Justice Checklist for Monitoring Subgrantees:</b> <i>The Grants Coordinator or Contract Monitor shall complete this form once within 30 days of executing a contract with a subgrantee. Second and subsequent checklists shall be completed according to the frequencies recommended in OJJ policy A.3.6. Any reports or corrective actions resulting from this checklist should prescribe the nature, due date, and expected result of the corrective action.</i>		
Question	Answer	Explanatory Comment and Correction, if Applicable
Does the subgrantee have a signed and legally executed copy of the contract?		
Is the subgrantee registered with the Louisiana Department of State?		
Is the subgrantee registered with the federal government's SAM system?		
Is the subgrantee in good standing with both registries above?		
Is the subgrantee able to offer administrative files as proof that it is a well-established non-profit or company qualified to perform grant duties?		
Does the subgrantee have one individual assigned to interact with OJJ?		
Does the subgrantee have one individual assigned to ensure that all deliverables are met?		
Has the subgrantee existed for more than two years?		
Which accounting principles does the subgrantee use?		
Does the subgrantee have cost codes to keep grant expenditures separate and to prevent cross spending or duplicate spending among different grants?		

Does a clear budget with detailed calculations for every future expense exist?		
Is the subgrantee submitting invoices with clear and delineated calculations for each item, totaling the full amount of the invoice?		
Do the invoices include sufficient back-up documentation with a brief progress report?		
Can the subgrantee provide documents or a log that demonstrates valid and reliable data collection?		
Has the subgrantee been showing up at the job site as scheduled?		
How many participants (youths in custody or supervision) have been assisted thus far? Can the subgrantee produce documents that support its claims of youth engagement?		
How many OJJ staff members have been trained thus far?		
How many _____ tasks have been completed thus far?		
How many _____ tasks have been completed thus far?		
How many _____ tasks have been completed thus far?		
How many _____ tasks have been completed thus far?		
What percent of each deliverable, goal, or objective has been completed thus far?		
Are activities being completed on schedule?		