

ENVIRONMENT DEPARTMENT POLICY

Effective Date: March 1, 1999

Policy Number: 06-02

Title: Grant Records Maintenance

Reference: OMB Circular 40 CFR Ch. 1, Part 31

PURPOSE

The purpose of this policy is to establish guidelines on records to be maintained to support activities funded by federal grants. This policy is required to coordinate record keeping documenting compliance with all obligations and conditions related to grants.

SCOPE

This policy applies to all Environment Department employees who are involved in the management and execution of federal grant programs. Specifically, it applies to the Division Directors, Bureau Chiefs, District Managers, and Program Managers funded by federal grants and the ASD Budget Section and Financial Services Bureau.

DEFINITION

Grant: Revenues derived from any federal source direct to the Environment Department or any revenue generating contract, Joint Powers Agreement or other agreement for which the budget section of ASD is to capture expenditure information, report and drawdown or claim reimbursement.

POLICY

It is the policy of the Environment Department that Program Managers, the ASD Budget Section and Financial Services Bureau adequately document activity funded by grants and maintain accurate grant records. The records are to be maintained on a current basis, available throughout the life of the grant, and the appropriate period thereafter. The records will support expenditures against the grant and financial claims from the funding agency, and to substantiate program performance and compliance with grant work plans and terms and conditions.

PROCEDURES

At a minimum, the following original information and documents will be retained as specified below. These files will be considered the official copy of record. Additional information may be maintained at the discretion of program managers if they feel it will benefit their program or if directed by the cognizant federal agency.

A. Program managers responsible for managing grant-funded activities or programs will maintain:

1. Grant application and related correspondence;
2. Program compliance statistics;
3. Compliance reports and correspondence;
4. Reports of contractors' correspondence and supporting documentation;
5. Records documenting compliance with terms and conditions of the grant;
6. Records of in-house cash and/or in-kind used to match federal grant expenditures;
7. Documentation to support MBE/WBE calculations;
8. Documentation of equipment purchased under the grant and maintenance records to ensure the property is kept in good condition; and
9. Certification that contractors are not debarred or suspended.

B. The ASD Budget Section will maintain:

1. Grant application;
2. Original copy of the grant award and amendments;
3. Letter of credit;
4. Expenditure reports, drawdown documents and related correspondence;
5. Journal entries for in-house cash and/or in-kind match;
6. Financial status reports and supporting documentation;
7. Indirect cost agreement and supporting documentation for establishing the negotiated rate; and
8. Quarterly MBE/WBE reports provided by program managers.

C. ASD Financial Services Bureau will maintain:

1. Copies of purchase orders and payment vouchers;
2. Copies of contracts and lease agreements; and
3. Aggregate fixed asset records.

DOCUMENTATION OF IN-KIND/IN HOUSE CASH MATCH WITHIN THE FINANCIAL SYSTEM

Match requirements will be included in the budget status report as Line Item 72: Grant Match.

The entry under the original budget column will be the match requirement. An off-setting, equal negative amount will be entered into the original budget column in Line Item 73: Grant Match (Contra). This will record the required match without affecting the totals for the overall budget. Match maintained by program managers will be entered into the budget status report through a journal entry provided to the ASD Budget Section who will enter it into Line Item 72. The entry under the year to date expenditures column and will be the sum of the match amount provided by the programs through journal entries. An off-setting, equal negative amount will be entered in the year to date expenditures column in Line Item 73. This will record the match documented by the program without affecting the totals for the overall budget (See attached example).

NON RECEIPT OF GRANT MATCH INFORMATION

Program managers will provide the journal entries by the fifteenth of each month for the previous month's expenditures. If the journal entry is not provided, the Budget Section will notify the responsible Division Director and Bureau Chief. If required, the Financial Services Bureau will freeze the org code to prevent further expenditures until the journal entry is provided.

PUBLIC RECORDS PROVISION

Records defined within the context of this policy are those which are related to the agreements between the Department and the funding agency. These records would include aggregations of statistical data to support program performance and compliance with the grant award terms and conditions. This policy does not include program records related to any services or treatment provided to individuals, which are considered non-public and confidential.

Attachment

Sample Budget Status Report

SECRETARY

Peter Maggi

DATE

3/4/99

FY99 BUDGET STATUS FUND=064 (General Operating Fund), ORGANIZATION=10230 (064 Zia Poll Prev Grant 99TH FFY H99458(0116))
 Current: FY99-99

Currency: USD

FY-99 (99TH FY), FUND=064 (General Operating Fund), ORGANIZATION=10230 (064 Zia Poll Prev Grant 99TH FFY H99458(0116))

OBJECT 1099 REPORT PROJECT FUNCTION	Original Budget	Budget Adjustments	Adjusted Budget	Year to Date Expenditures	Outstanding Obligations	Outstanding Commitments	Total O/S Encumbrances	Remaining Budget	This Month's Expenditures	This Month's BARS
5000200	0.00	0.00	0.00	11,549.25	0.00	0.00	0.00	(11,549.25)	0.00	0.00
5000999	11,508.00	11,508.00	11,508.00	0.00	0.00	0.00	0.00	11,508.00	0.00	0.00
CATEGORY TOTAL	11,508.00	11,508.00	11,508.00	11,549.25	0.00	0.00	0.00	(41.25)	0.00	0.00
5001100	0.00	0.00	0.00	923.68	0.00	0.00	0.00	(923.68)	0.00	0.00
5001200	0.00	0.00	0.00	1,915.99	0.00	0.00	0.00	(1,915.99)	0.00	0.00
5001300	0.00	0.00	0.00	858.20	0.00	0.00	0.00	(858.20)	0.00	0.00
5001400	0.00	0.00	0.00	2.00	0.00	0.00	0.00	(2.00)	0.00	0.00
5001700	0.00	0.00	0.00	115.48	0.00	0.00	0.00	(115.48)	0.00	0.00
5001999	3,936.00	3,936.00	3,936.00	0.00	0.00	0.00	0.00	3,936.00	0.00	0.00
CATEGORY TOTAL	3,936.00	3,936.00	3,936.00	3,225.35	0.00	0.00	0.00	710.65	0.00	0.00
5002999	1,837.00	1,837.00	1,837.00	0.00	0.00	0.00	0.00	1,837.00	0.00	0.00
CATEGORY TOTAL	1,837.00	1,837.00	1,837.00	0.00	0.00	0.00	0.00	1,837.00	0.00	0.00
5004100	0.00	0.00	0.00	18.78	0.00	0.00	0.00	(18.78)	0.00	0.00
5004900	0.00	0.00	0.00	3.15	0.00	0.00	0.00	(3.15)	0.00	0.00
5004999	1,919.00	1,919.00	1,919.00	0.00	0.00	0.00	0.00	1,919.00	0.00	0.00
CATEGORY TOTAL	1,919.00	1,919.00	1,919.00	21.93	0.00	0.00	0.00	1,897.07	0.00	0.00
5005300	0.00	0.00	0.00	0.00	28,244.00	0.00	28,244.00	(28,244.00)	0.00	0.00
5005599	28,244.00	28,244.00	28,244.00	0.00	0.00	0.00	0.00	28,244.00	0.00	0.00
CATEGORY TOTAL	28,244.00	28,244.00	28,244.00	0.00	28,244.00	0.00	28,244.00	0.00	0.00	0.00
5006100	0.00	0.00	0.00	430.19	0.00	0.00	0.00	(430.19)	0.00	0.00
5006500	0.00	0.00	0.00	29.10	0.00	0.00	0.00	(29.10)	0.00	0.00
5006700	0.00	0.00	0.00	175.00	0.00	0.00	0.00	(175.00)	0.00	0.00
5006999	452.00	452.00	452.00	0.00	0.00	0.00	0.00	452.00	0.00	0.00
CATEGORY TOTAL	452.00	452.00	452.00	634.29	0.00	0.00	0.00	(182.29)	0.00	0.00
5007200	10,000.00	10,000.00	10,000.00	10,000.00	0.00	0.00	0.00	0.00	10,000.00	10,000.00
5007300	(10,000.00)	(10,000.00)	(10,000.00)	(10,000.00)	0.00	0.00	0.00	0.00	(10,000.00)	(10,000.00)
5009600	0.00	0.00	0.00	280.00	0.00	0.00	0.00	(280.00)	0.00	0.00
5009999	1,781.00	1,781.00	1,781.00	0.00	0.00	0.00	0.00	1,781.00	0.00	0.00
CATEGORY TOTAL	1,781.00	1,781.00	1,781.00	280.00	0.00	0.00	0.00	1,501.00	0.00	0.00