



Adopted by the  
Full ARC on 11/21/13

## **POLICY FOR PURSUIT AND ACCEPTANCE OF GRANTS, SUBGRANT ELIGIBILITY AND GRANT MANAGEMENT**

### **Revised 9/13/22**

#### **BACKGROUND**

The Alliance of Rouge Communities routinely applies for grants from the state and federal government and from private foundations. The projects proposed for grant funding can benefit the entire watershed or a specific area, i.e., a branch of the Rouge River, a specific area of the watershed, or a member community or cooperating partner. Upon receipt of a grant for Rouge River restoration activities, the ARC may implement the project on behalf of the watershed and/or may issue subgrants for all or part of the work to ARC members, cooperating partners, or other parties.

Further, the ARC has advised Wayne County Department of Public Service on the eligibility requirements for subgrants awarded under the provisions of the Rouge River National Wet Weather Demonstration Project (Rouge Project). Wayne County has acted upon the advice of the ARC including limiting the subgrant eligibility of communities in the Rouge watershed to those that are members of the ARC. At its August 2006 meeting, the ARC passed a resolution concerning future eligibility of communities within the Rouge River watershed for grant dollars from both the Rouge Project administered by Wayne County, and future grants obtained by the ARC itself.

This policy addresses:

- Pursuit and Acceptance of Grants, including Determination of Grant Match and Documentation,
- Grant Management,
- Subgrant Eligibility, and
- Subgrant Requirements and Management.

Any divergence from this policy shall be first reviewed by the ARC Executive Committee and subsequently approved by the ARC members at a regular meeting of the ARC.

#### **PURSUIT AND ACCEPTANCE OF GRANTS**

On March 25, 2010, the ARC approved the document "Procedures for the Pursuit and Acceptance of Grants", shown below and hereby incorporated into this Policy.

#### **Objectives**

- Take a proactive approach to the pursuit of grant opportunities to support ongoing ARC activities
- Develop a policy that maximizes probability of success and includes proper authorization to commit grant pursuit and match funds

**Application Criteria**

The ARC will apply for grants that offer watershed-wide benefits. Application for grants that provide only local benefits may be reviewed on a case by case basis.

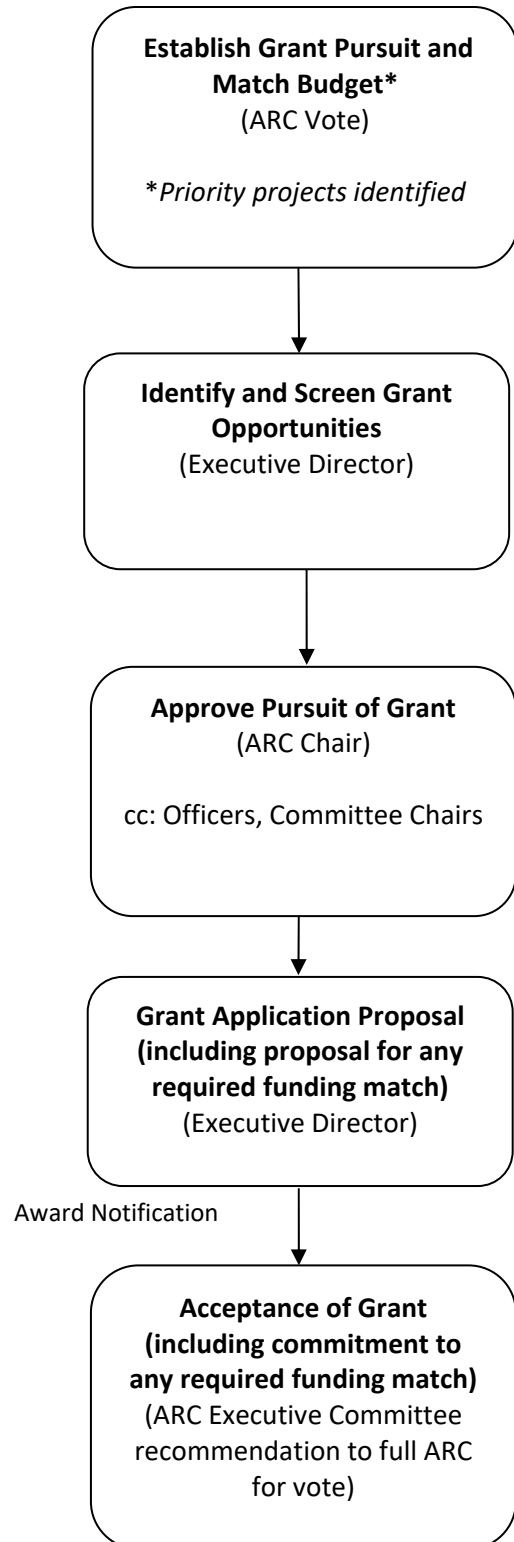
ARC grant applications shall focus on ARC core priorities such as:

- Watershed management planning and implementation
- Illicit Discharge Elimination Plan investigations
- Public involvement and education
- Studies and collection of data
- Data management and analysis
- Annual reporting
- Staff support

**Policies**

Consistent with ARC procurement policy, the ARC may accept assistance from ARC members, consultants and other interested parties to help prepare grant applications.

The ARC may choose to provide letters of support and/or commitment for grant applications submitted by ARC members, cooperating partners, or other appropriate organizations. Letters of support/commitment from the ARC will be issued at the discretion of and by the ARC Chair upon receipt of requests submitted directly to the Chair.



## **DETERMINATION OF GRANT MATCH AND DOCUMENTATION**

In some cases, a granting agency may require that the successful grantee provide funding for part of the estimated project costs as match or cost sharing (“grant match”). Typically, if grant match is required, it must be described and enumerated in the grant application. If match is required to be pledged in a grant application, ARC staff will recommend a grant match plan based on the proposed grant activities. If the grant match plan includes contributions by individual ARC member communities, cooperating partners, or others, those parties included in the ARC’s grant application (“ARC team”) will provide a letter committing to and documenting the dollar value of any match, cost-sharing or in-kinds services that they will provide for federally funded projects. Eligible activities for grant match are specified by the grant contract and if allowed, typically include in-kind services, cash and/or volunteer time.

### **In Kind Services**

If consistent with the grant requirements, in-kind services furnished by professional and technical personnel, consultants, and other skilled and unskilled labor may be included as grant match if the service is an integral and necessary part of an approved project or program. In-kind services shall be consistent with those paid for by the ARC for similar work or in a subgrantee’s organization. In those instances where the required skills are not found in the ARC team’s organization, rates shall be consistent with those paid for similar work in the labor market in which the ARC team competes for the type of services involved. In either case, paid fringe benefits that are reasonable, allowable and allocable may be included in the valuation. When an employer other than the ARC furnishes the services of an employee, these services shall be valued at the employee’s regular rate of pay (plus an amount of fringe benefits that are reasonable, allowable, and allocable, but exclusive of overhead costs), provided these services utilize the same skill for which the employee is normally paid. In-kind match will be documented using timesheets.

### **Cash Match or Cost Sharing**

Cash match or cost-sharing is payment for services/goods related to the grant and is documented by paid invoices.

### **Volunteer Match**

If consistent with the grant requirements, the value of volunteer match will be calculated based on generally accepted hourly rates approved by the granting agency and will be documented using sign-in sheets that include the activity, the date, times worked and the name of the volunteer.

The grant match plan will be enumerated in the grant application and will meet the following criteria:

- Is verifiable from the ARC’s or subgrantee’s records;
- Is not included as contributions for any other federally-assisted project or program;
- Is necessary and reasonable for proper and efficient accomplishment of project or program objectives; and
- Is not paid by the Federal Government under another award, except where authorized by Federal statute to be used for cost sharing or matching.

## **GRANT MANAGEMENT AND CONTRACTOR MONITORING**

The ARC and its staff will be responsible for the overall monitoring of contractors, contract administration, direction, and quality management for all accepted grant contracts. Grant management activities include but are not limited to administration of the grant and any subgrants, reporting, quality assurance and quality control, communication with granting agencies, and other necessary activities to ensure that the project is conducted in accordance with the grant agreement and any other requirements of the granting agency and with ARC policies and procedures. Contractor invoices will be

reviewed by ARC Staff before continuing the procedures for payment outlined in the ARC Accounting Procedures Manual.

Changes to the grant match plan included in the grant application and/or contract which are needed during the term of the grant agreement will be approved by the ARC Executive Committee and federal funding agency prior to implementation.

All correspondence with contractors will be included in the federal award file and

### **SUBGRANT ELIGIBILITY**

It is the policy of the ARC that any grants received by the ARC and allocated in the form of subgrants to other entities shall be limited to:

- Agencies that are members in good standing of the ARC (Primary and Associate Members, i.e., public agencies that have adopted the bylaws of the ARC and have paid their assessments as well as approved nested jurisdictions of ARC members in good standing); or
- Public or private entities not eligible for ARC membership (i.e. Cooperating Partners, such as autonomous public entities with no Rouge River water discharge permit requirements, and private non-profit or private educational institutions).

Further, it is the policy of the ARC that it will conduct projects at locations in ARC and non-ARC member communities if it is awarded grants related to the Rouge River Area of Concern (i.e., Great Lakes Restoration grants) which cover the entire watershed and are tied to beneficial use impairments in the entire Rouge River Watershed.

### **SUBGRANT REQUIREMENTS AND MANAGEMENT OF AWARDED SUBGRANTS**

Any ARC member awarded a subgrant shall remain an ARC member in good standing throughout the term of the subgrant award. In the event that an ARC member is awarded a subgrant and subsequently chooses not to remain a member of the ARC during the term of any subgrant, the subgrant award or interagency subgrant agreement shall provide for a means to authorize the ARC to terminate the subgrant and retain any unpaid portion of the subgrant.

In the event a grant is awarded to the ARC for the Rouge River Area of Concern, which encompasses the entire Rouge River Watershed, subgrants may be awarded to non-ARC member communities. Grants may also be administered by the ARC on behalf of non-ARC member communities.

In addition to grant and contractual requirements enumerated in agreements between the ARC and another party, any subgrants issued by the ARC will be monitored in the following ways:

- Subrecipients will be required to provide written monthly financial and project progress reports to the ARC, unless otherwise noted in the contract, and
- Projects covered by subawards between the ARC and another party will be monitored during site visits by ARC staff.

Other criteria may be enumerated in the contract between the ARC and the subgrantee.