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Community Investment Policies

Revised March 2022

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INTRODUCTION

This manual establishes the City of Saint Louis Mental Health Board of Trustees (“Saint Louis MHB” or “MHB”) rules and principles for distributing the financial resources with which it is entrusted. The Community Investment Policies have evolved over the Board’s history of administering tax revenues and reflect lessons learned. These policies have been restated to be in keeping with the mission, vision and values the Board reaffirmed in April 2016, and to be consistent with existing statutes and regulations.

MHB was established in 1994. The Mayor appoints the Trustees with the advice and consent of the Board of Aldermen. The statutory authority for the formation, operation and scope of the Saint Louis MHB can be found in Sections 205.975 – 205.990, 67.1775, and 210.860 – 210.861 R.S.Mo.

In November 1992, St. Louis voters passed a tax referendum to create, maintain, and enhance services for City residents with mental health and/or substance use problems. MHB is entrusted to administer the public revenues generated by this tax. The statutory authority for the mental health tax levy can be found in Sections 205.977 – 205.980 R.S.Mo.

In November 2004, St. Louis voters passed a second tax referendum to create, maintain, and enhance services to protect the well-being and safety of the city’s children and youth and to strengthen the city’s families. MHB is also entrusted to administer the public revenues this tax generates. The statutory authority for the children’s tax levy can be found in Sections 210.860 R.S.Mo.

MHB pursues grants for mental health, substance use, children and family services from other sources such as federal or state governments or private foundations. From time to time, MHB also partners with other sources to jointly invest in outcomes. MHB does not provide direct services; thus, all direct service investments flow into community agencies/organizations.

The main section of this document includes the policies adopted by the Trustees which apply to investments made by MHB.

Cassandra Kaufman

Executive Director

POLICIES WHICH APPLY TO ALL INVESTMENTS MADE BY MHB

Reservation of Rights

The policies and implementation stated herein are intended to guide MHB action. However, within the scope of its statutory authority, MHB reserves the right to unconditionally amend, modify, waive or cancel, in whole or in part, any policy or procedure, or the application thereof to any situation, if MHB deems it to be in its best interest to do so. MHB may exercise this right without notice or specific reference to these policies, and without any liability to any party.

MHB will be held harmless in regard to the provision of any services by a recipient of funds.

Statutory Obligations

Saint Louis MHB will endeavor to comply with all statutory obligations to which it is subject. Several such obligations may be of particular interest to potential applicants for investment.

1. MHB will comply with the *Missouri Public Records Law of 1961*. Applicants for funding should be aware that all documents and correspondence submitted to MHB become part of the open public record.
2. MHB will comply with all aspects of the *Missouri Sunshine Law* regarding open meetings and records. Applicants for investments should be aware that our selection process occurs in a forum which is open to the public. The Sunshine Law also further prescribes that MHB's records are open to the public.
3. MHB will comply with the *Conflict of Interest* rules of the Missouri Ethics Commission. Applicants for investment should be aware that no MHB Trustee will participate in the review, discussion or selection for any applicant with whom there might be either an actual conflict or an appearance of a conflict of interest.
4. MHB will comply with the *Health Insurance Portability and Accountability Act of 1996 (HIPAA)* by neither accepting nor maintaining any document bearing the name or identifying information of any consumer receiving services. Applicants for investments must also comply with HIPAA and must include authorizing releases of information in files which allow MHB to regularly inspect records.

Eligibility for Investment

MHB will consider applications for investment only if all pertinent eligibility requirements regarding the applicant's organization, services, and consumers are met.

1. MHB will invest only in organizations that demonstrate fiscal, administrative and managerial stability, prudence, and diligence.
 - a. Recipients of funds must submit both an *independent audit and management letter*, if issued, each year. The audit must be conducted by a Certified Public Accountant.

The audit must include or be accompanied by a Single Audit (if applicable). Recipients must address immediately any deficiencies noted by the auditor to the satisfaction of MHB. Audits are to be submitted within 180 days of the end of each organization's fiscal year.

- b. MHB reserves the right to approve any change to *key personnel* assigned to a project receiving investment.
- c. MHB requires all applicants to maintain *minimum levels of insurance* as periodically recommended by our legal counsel.

Current insurance requirements are:
Comprehensive General Liability insurance of at least \$1,000,000 general aggregate and \$1,000,000 each occurrence;
Workers' Compensation insurance with the minimum coverage required by Missouri law;
Professional Liability and Malpractice insurance (for any licensed professional employed in an MHB-funded program) of \$1,000,000 aggregate and \$1,000,000 each occurrence; and
Commercial Vehicle liability insurance (for any vehicles purchased through an MHB grant) of \$1,000,000.

- d. MHB shall have a preference for investing in organizations and/or projects with *diversified sources of revenue* (i.e., funding from at least one other source).
 - e. MHB will make investments only to not-for-profit organizations *in good standing with the Secretary of State* to do business in Missouri or organizations established by charter or statute.
 - f. MHB may require *new or smaller organizations* to partner with more established organizations for administrative support.
2. MHB will invest only in organizations that comply with all *local, state and federal regulations* related to fair labor practice, workplace safety, accessibility and consumer protection. Applicants should be aware that MHB assesses compliance with these laws each year and that this assessment includes an assessment of compliance with Executive Order 11246 regarding Affirmative Action.
 3. MHB shall only make investments in organizations and/or projects which demonstrate that individuals receiving mental healthcare services shall have a documented *mental health diagnosis* determined by a qualified mental healthcare provider except for prevention or early intervention of mental illness and/or substance abuse, outreach and engagement, crisis intervention, or other services where such a diagnosis would be a clear barrier to service.
 4. MHB shall only invest in applicants that demonstrate their ability to provide *culturally and linguistically appropriate services*.

5. MHB funds shall not be used to provide any direct or indirect support of any religious education, service, or otherwise assist the religious mission of the church. Funds are provided solely to assist youth and adults in a content neutral manner.
6. MHB shall have a preference for investing in organizations and/or projects whose *governing board members* reside in the City or County of St. Louis.
7. MHB shall have a preference for investing in organizations and/or projects whose *services are provided in the City of St. Louis*.
8. MHB shall only make investments in organizations and/or projects which demonstrate that MHB funds will not be used to *supplant* other sources of revenue.
9. MHB shall only make investments in organizations and/or projects which meet all *additional specific eligibility requirements* established by a specific source of revenues.
10. MHB shall only make investments in organizations and/or projects which meet all *additional specific eligibility requirements* established in the “Givens” section of pertinent MHB Notices of Funding Availability (NOFA).

Public Accountability

MHB strives to achieve a high level of accountability to the public on whom it relies for support.

1. MHB shall endeavor to focus its resources in a deliberate, professional manner based on *professional needs assessments and strategic planning*. To that end, MHB may conduct periodic, systematic and comprehensive assessments and/or periodic specialty assessments of mental health and substance use service needs for residents of the City of St. Louis. Primarily, MHB shall conduct periodic strategic planning sessions to set the outcomes and identify the results the Board shall commit to achieving for City residents.
2. MHB shall endeavor to inform the public regarding mental health issues relevant to the residents of the City of St. Louis. Recipients of investments shall be required to participate in these efforts. MHB shall periodically issue a *Communications Standards* manual with which all recipients of investments shall be expected to comply.
3. MHB shall endeavor to inform the public regarding its activities, investments, and achievements. MHB shall publish an *Annual Report* which includes a list of funded partners, an outline of investment priorities, as well as a review and analysis of results and impacts realized.

Disbursements

MHB normally disburses investments in twelve equal monthly payments. As required by other funding sources, at the request of an applicant organization or on an *ad hoc* basis, MHB also disburses funds on an expense-reimbursement or on a fee-for-service basis.

1. MHB will disburse funds only after a *formal contract is duly executed*.

2. MHB will disburse funds only to recipients of investments who are in *full program and fiscal compliance* with the terms of their contracts. MHB reserves the right to withhold payment for all contracts in cases of fiscal non-compliance. Recipients of investments should be aware that MHB will delay payment of any funds for which the recipient has delayed submission of required supporting documents and/or reporting. Recipients should also be aware that the final payment on any project may be delayed by thirty (30) to sixty (60) days pending receipt of final reports.
3. MHB requires *two authorized signatures* on all investment payment checks up to \$15,000.00.

Oversight

1. All recipients of investments must submit *timely, periodic status reports*.
2. All recipients of investments are subject to *annual site visits* by MHB staff to assure fidelity to the application for investment, efficacy and fiscal accountability.
3. Any *capital assets or equipment* with a unit cost of \$3,000.00 or more that is purchased with funds from MHB must be retained and used continually for the purposes originally intended for a period of three years from the date of purchase. MHB may inspect or repossess any such asset during that five-year window.
4. Any recipient of investments found to be out of compliance with their contract or MHB's policies shall be required to take *corrective action* to remedy the deficiency. Should a recipient fail to come into compliance, MHB will take further action up to and including terminating the investment.

Contracting

Each project invested in by MHB shall be governed by a duly executed contract which provides a detailed description of the relationship with MHB and MHB's specific expectations and requirements regarding the project.

1. MHB will award contracts for investments for a *maximum period of one year*.
2. Most investments made by MHB are intended to be multi-year projects. MHB will provide *annual renewals* for the length of the investment contingent upon the availability of funds and the applicant's re-application and good standing with MHB.
3. Contracts shall only be considered duly executed when they are signed by MHB's Executive Director, Attorney and an officer of MHB's Board AND by the recipient organization's *authorized signatories* (e.g., Executive Director and/or Board Officer).

Communication with Funded Partners

All *contract-related written communication* between MHB and funded partners shall be kept on file by MHB as part of the public record. Electronic mail and faxes are subject to and will be maintained in accordance with Missouri Sunshine Law. Contract-related correspondence and documents mailed

by MHB shall be sent by certified mail, return receipt requested (or by a similar delivery service with delivery confirmation). Examples of contract related correspondence include contracts, amendments, required reports, site visit reports, corrective action plans, correspondence regarding progress on corrective action plans, correspondence regarding problems with reporting, etc.

SPECIFIC POLICIES FOR INVESTMENT FROM COMMUNITY MENTAL HEALTH FUND TAX REVENUES

City Residents

Any investment made by MHB which includes local Community Mental Health Fund tax revenues is restricted to services which are provided to City residents. In programs which do not exclusively serve City residents, MHB funds shall not fund a proportion of the total program budget in excess of the proportion of services to City residents.

Maximum Investment

No single program or project investment from local Community Mental Health Fund tax revenues shall exceed \$750,000 in any fiscal year. If a proposed project is new to an organization, the total requested from MHB cannot exceed \$100,000 in the first year.

Designation by the Missouri Department of Mental Health

MHB shall make investments from local mental health tax revenues only in support of services which are designated eligible by the Missouri Department of Mental Health that contribute to MHBs investment outcomes.

Three-Year Cycle

MHB's primary use of local tax revenues shall be investments made in a three-year cycle. The first year of this cycle shall be an open competition for investments based on the needs identified by MHB in its needs assessments and the goals prioritized by the Board. The two following years shall be open only to re-applications from those projects which are achieving their specific contracted outcome and/or which use program learning to demonstrate improved performance to a degree which assures MHB there is a reasonable likelihood of future success. When organizations are not meeting their contracted outcome, MHB may reallocate funds to other providers within the same goal area or to another goal area altogether.

Special Investments

MHB may, from time to time, set aside funds from ongoing mental health or children's services tax revenues for *special projects or purposes other than Three Year Investments*. The eligibility requirements for investing in these special projects may differ from those imposed on those seeking funding through competitive grants. MHB also may establish from time-to-time special reserves which may be used for such purposes. A detailed description of each reserve and the specific purposes for which it may be used is available in MHB's *Statement of Financial Control and Accountability*.

SPECIFIC POLICIES FOR INVESTMENTS FROM COMMUNITY CHILDREN'S SERVICES FUND TAX REVENUES

City Residents

Any investment made by MHB which includes local Community Children's Services Fund tax revenues is restricted to services which are provided to City residents age 18 and under. In programs which do not exclusively serve City residents, MHB funds shall not fund a proportion of the total program budget in excess of the proportion of services to City residents.

Maximum Investment

No single program or project investment from local Community Children's Services Fund tax revenues shall exceed \$750,000 in any fiscal year. If a proposed project is a start-up, the total requested from MHB cannot exceed \$100,000 in the first year. Funding for collaborative early childhood start-up projects awarded to intermediary organizations from Community Children's Services Fund designated Early Childhood funding, cannot exceed \$300,000 the first year.

Certification or License

For services for which the State of Missouri has established licensing or certification standards, MHB shall make investments from the Community Children's Service Fund tax revenues only in support of services which are licensed or certified by the State of Missouri and that contribute to the outcomes prioritized by the Board. Exceptions may be made when one of the objectives of the project is for the service to obtain the appropriate license or certification during the life of the project.

Accreditation

For services for which one or more national organizations have established accreditation, MHB shall have a preference for those programs and/or projects which have attained the accreditation. Exceptions may be made when one of the objectives of the project is to obtain the accreditation during the life of the project.

Three-Year Cycle

MHB's primary use of local tax revenues shall be investments made in a three-year cycle. The first year of this cycle shall be an open competition for investments based on the needs identified by MHB in its needs assessments and the goals prioritized by the Board. The two following years shall be open only to re-applications from those projects which are achieving their specific contracted outcomes and/or which use program learning to demonstrate improved performance to a degree which assures MHB there is a reasonable likelihood of future success. When organizations are not meeting their contracted outcome, MHB may reallocate funds to other providers within the same goal area or to another goal area altogether.

Special Investments

MHB may, from time-to-time, set aside funds from ongoing Community Children’s Services Fund tax revenues for *special projects or purposes other than Recurring Project Investments*. MHB also may establish from time-to-time special reserves which may be used for such purposes. A detailed description of each reserve and the specific purposes for which it may be used is available in MHB’s *Statement of Financial Control and Accountability*.

GENERAL POLICIES* FOR INVESTMENTS FROM FEDERAL/OTHER THIRD-PARTY SOURCES

When MHB Will Apply for Additional Funds

MHB will seek to identify and pursue additional outside funding opportunities which fulfill all of the following requirements:

1. The opportunity is consistent with the mission, vision, values, and outcomes of MHB.
2. The opportunity is consistent with current needs that may be identified by MHB’s needs assessments.
3. MHB has the capacity to complete the application process by the application deadline and to satisfy the administrative and financial requirements of the funding source over the life of the award.
4. MHB believes that it can make a competitive bid for the funds.

*For detailed policies regarding federal funding please see ‘Addendum – Policies Related to Federal Grants’.

MHB’s Role

MHB shall serve as the administrator of projects receiving funds by federal/other third-party sources. MHB shall subcontract with community service providers to provide direct services to achieve and/or evaluate and verify results that contribute to MHB outcomes. MHB shall ensure that all requirements established by the funding source are met by its staff and all subcontractors.

MHB shall serve as the facilitator for any required community collaboration effort.

Additional Eligibility Requirements

In addition to MHB’s own eligibility requirements, each funder has its own eligibility requirements. MHB will only select community service providers that meet both MHB’s eligibility requirements and the federal/other funder’s eligibility requirements. Community service providers must also agree to meet not only the service obligations of an award, but also any evaluation and administrative

obligations required by the funder. Community service providers must have the capacity to dedicate the resources necessary to fulfill the application requirements and to implement an award on the timelines established by the funder.

Compliance with the *Drug-Free Workplace Act* and the *National Standards for Culturally and Linguistically Appropriate Services in Healthcare (CLAS)* are almost always required. The *Drug-Free Workplace Act* requires that community service providers fulfill the following six (6) criteria:

1. The employer must have a written policy that explains what is prohibited and the consequences of violating the policy.
2. Employees must read and consent to the policy as a condition of employment on the project.
3. The employer must have an awareness program to educate employees about alcohol and other drug abuse and addiction, the employer's policy and available help, counseling, and assistance.
4. Employees must disclose any conviction for a drug-related offense in the workplace to the employer within five (5) days after such conviction.
5. Employers must disclose any conviction for a drug-related offense in the workplace to the Federal agency with which the employer has a grant or contract within 10 days after receiving notice from the employee or others.
6. Employers must make an ongoing effort to maintain a workplace free of drugs.

The *National Standards for Culturally and Linguistically Appropriate Services in Healthcare (CLAS)* standards also require that community service providers meet the following four (4) criteria:

1. Health Care Organizations must offer and provide language assistance services, including bilingual staff and interpreter services, at no cost to each patient/consumer with limited English proficiency at all points of contact, in a timely manner during all hours of operation.
2. Health Care Organizations must provide to patients/consumers in their preferred language both verbal offers and written notices informing them of their right to receive language assistance services.
3. Health Care Organizations must assure the competence of language assistance provided to limited English proficient patients/consumers by interpreters and bilingual staff. Family and friends should not be used to provide interpretation services (except on request by the patient/consumer).
4. Health Care Organizations must make available easily understood patient-related materials and post signage in the languages of the commonly encountered groups and/or groups represented in the service area.

Solicitation of Community Service Providers

When the timeline and requirements of an opportunity allow, MHB shall select community service providers through a competitive process. Unfortunately, most federal and state funds require that service providers be identified before an application is made and on a timeline which prohibits such a process. MHB will, under such circumstances, solicit service providers whom it believes will contribute to the most competitive application possible.

Application Process

Most application timelines are very brief. Organizations interested in being a community partner on such a project should be prepared to dedicate considerable staff hours to meetings and planning in the application process. Community service providers may be asked to write specific sections of an application upon which they have special expertise or knowledge. Community service providers must submit all supporting documentation required for the application in a timely manner, and often at the last minute.

Fiscal Year

MHB shall utilize subcontracts to make investments based upon the Fiscal Year of the funding source.

Reporting Requirements

Most federal funding programs and third-party funding sources have specific reporting requirements which must be met by recipients. These may include financial, service data, evaluation or other reports. MHB will ensure that all reporting deadlines are met. In the unlikely event that a community partner is unable to supply the information necessary for MHB to meet such obligations, MHB shall take corrective action up to terminating the investment and reassigning it to another community partner.

Disbursements

Most awards made from federal/other third-party revenues are disbursed on an expense-reimbursement basis. Most of these awards also have specific line-item budgets which require community service providers to request approval for any changes in spending *before* they occur.

SPECIFIC POLICIES FOR INVESTMENTS RELATED TO CAPITAL ITEMS

Specific Guidelines Related to Capital Investments

Allowable Requests

- For the purposes of this investment, no requests will be entertained for land acquisition, capital campaigns, building acquisitions, expansion of existing buildings or construction of new buildings/facilities.

- Capital improvements in the areas of rehabilitation or enhancement of existing facilities will be considered only if the applicant holds the mortgage on the property to be improved.
- Requests for rehabilitation or enhancement of existing facilities will be considered only for property located within the City of St. Louis.
- All projects that require building or occupancy permits must obtain all permits as required by the City of St. Louis.
- Capital improvement in the areas of major equipment or materials will be considered within the allowable costs identified for this investment.
- All requests must meet any and all applicable general guidelines related to capital investments as outlined in this document.
- MHB shall invest 80% of the cost of the proposed capital improvement or equipment acquisition. The applicant or an identified third-party must invest the first 20% of the total cost of the proposed capital improvement or equipment acquisition.
- A Board resolution from the applicant's organization which supports the applicant's required 20% investment in the proposed project must be included with the proposal.
- The maximum amount that may be requested in any proposal will be \$200,000.
- All organizations that are eligible for MHB funding (as outlined previously in this document) are eligible to apply for a capital improvement/equipment acquisition grant.
- Organizations may submit only one proposal in response to this Notice of Funding Availability (NOFA).
- The Board has identified a total investment of \$1,000,000 for this NOFA.

Prioritization

- Among qualified proposals, first priority will be given to proposals for which clients/participants are the primary beneficiary.
- Among qualified proposals, second priority will be given to proposals for which clients/participants are indirect beneficiaries.
- Among qualified proposals, third priority will be given to proposals for which the organization is the primary beneficiary.

General Guidelines Related to Capital Investments

Major Equipment or Materials Guidelines

The following guidelines apply to all capital requests.

- MHB requires that three bids be obtained and submitted by organizations when requesting funds for purchase of capital items including equipment, construction, renovations, vehicles, and other capital requests when the unit cost is \$3,000 or more. Agencies shall use the following procedures when obtaining bids on capital items with a unit cost of \$3,000 or more and a useful life of more than one year:
 - Specifications shall be written in sufficient detail to assure consistent response to the organization's request for bids.
 - Organization bid requests shall be submitted to similar vendors.
 - Organizations shall submit a minimum of three signed bids specifying agency bid preferences.
 - In the event that organizations do not select the lowest bid, a written rationale must be provided for approval.
 - In the event there are less than three vendors responding to a bid request, agencies must request a waiver of policy from MHB prior to purchasing the item(s). Certification from the agency of their independence from selected vendor in relation to the organization's board, employees, and participants must be submitted with the request.
- Organizations shall maintain accurate inventory control procedures of capital items purchased with MHB funds. Organizations are required to clearly identify items by specific MHB project and component numbers.
 - Organizations shall receive payment from MHB upon verified completion of project or receipt of equipment.
 - Organizations shall maintain a control system to ensure adequate safeguards to prevent loss, damage or theft of property. Agencies that experience any loss, damage or theft of capital items purchased with MHB funds shall have an investigation conducted. A written copy of the investigation findings shall be submitted to MHB. A statement describing how agencies will replace the item(s) must also be included.
- All capital items purchased with MHB funds shall be depreciated in accordance with accounting principles generally accepted in the United States (GAAP). MHB recommends that organizations establish and fund a depreciation reserve, if possible, to provide for the future replacement of capital items.

- Organizations will have and maintain adequate comprehensive property insurance for all capital items purchased, constructed or renovated in part or in full with MHB funds to assure replacement of the organization’s capital assets in the event of a loss due to an insurable event. Documentation of insurance shall be submitted to the MHB on an annual basis.
- If capital items purchased, constructed, or renovated with MHB funds are found not to be used during a consecutive six-month period of time while they are owned by the organization, said capital items will be made available to the MHB for reassignment to another organization, or for sale, with proceeds returning to MHB.
- MHB approval is required prior to selling, trading or reassigning any capital items purchased, constructed or renovated with MHB funds.

Construction and Renovation Guidelines

These guidelines apply to all renovation requests.

- MHB and/or its agents reserve the right to:
 - Review and approve all contractual agreements related to the projects.
 - Review and approve all original and revised project plans, including but not limited to design, cost, regulatory requirements, zoning issues, and proposed services.
 - Monitor the progress of the renovation and, at the MHB’s discretion, certify satisfactory percentage of completion prior to funds disbursement.
- If the organization either sells or trades the facility that was renovated with MHB funds or ceases to provide the same services at such facility, then all or part of MHB funds disbursed to the agency for this project shall be repaid to MHB. The amount of funds to be repaid to MHB will be calculated as follows: Total amount of funds disbursed less one tenth per year for each year the property is used for the purpose represented in the project. MHB reserves the right to require an organization to repay the total amount of funds granted for renovations if the organization sells their facility or ceases to provide the same services.
- If the facility is sold and the organization reinvests the sale proceeds in another facility to be used for the same purpose, the organization shall be liable to refund only the excess sale proceeds not reinvested in the new facility. This refund shall be limited to the amount of the grant provided to the agency.
- If the organization ceases to provide the same services at such facility, but continues to use the facility in a manner that would otherwise meet the statutory and policy requirements of the MHB, no refund of the grant provided shall be required as long as the organization receives prior approval from MHB. Any change in the services rendered at the facility may be made only after application to and written approval from MHB.

Vehicle Acquisition

MHB will consider granting funds to organizations to purchase vehicles that are used primarily for transporting participants eligible for MHB-funded services. If MHB funds are requested to replace existing organization vehicles, MHB may require the organization to reduce the costs to MHB by the book or trade value of the vehicle to be replaced.

- Applications for funds will be considered for replacement of organization vehicles only when the odometer reading is at least 100,000 miles and the vehicle is four years old, or it can be demonstrated that the vehicle is inoperable due to accident or total mechanical failure not caused by negligent maintenance.
- It is the intent of this policy to encourage organizations to raise equity through fund raising for the replacement of vehicles. Therefore, MHB recommends that when organizations depreciate vehicle capital assets, a funded reserve should be established.
- Organizations are required to provide the MHB with vehicle identification numbers and other appropriate identifying information on vehicles purchased with MHB funds, for purposes of monitoring the application of this policy.
- Organizations must submit a request in writing for the MHB's permission to dispose of a vehicle purchased with MHB funds. Vehicles may be sold outright to a third party, transferred to another not-for-profit organization for similar use or purchased by the organization for use in another service.

ADDENDUM – POLICIES RELATED TO FEDERAL GRANTS

MHB serves as a pass-through entity administering projects which are federally funded. In these cases, all MHB policies described above are applicable to any subawards (statutory requirements, conflict of interest, HIPPA, etc.). There are however additional subaward compliance requirements for which MHB as the administrator of federal funds must comply.

The full Uniform Guidance or (CFR 200-331) can be referenced here:

<https://www.gpo.gov/fdsys/granule/CFR-2014-title2-vol1/CFR-2014-title2-vol1-sec200-331>

In procuring services in partial fulfillment of a federal grant, MHB will first make a case-by-case determination whether each agreement it enters for the disbursement of federal program funds casts the party receiving the funds ("awardee") as a subrecipient or a contractor. The determination will dictate whether MHB treats the agreement as a "subaward" or a "contract," and that treatment will impact whether certain terms are included in the agreement. MHB will use the factors set forth in 2 CFR 200.330 to make that determination.

Those community service providers deemed as subrecipients will enter into a subrecipient agreement only after a risk assessment of the organization has been conducted. The risk assessment includes a suspension or debarment verification process through the System for Award Management (SAM) exclusions list and a financial audit review including the organization's single audit when applicable.

The subaward agreements themselves include all required elements as per 2 CFR 200.331. Throughout the term of the subaward agreement, subrecipients are monitored via periodic site visits, records audits (including management decisions related to appropriate use of federal funds). All monitoring information is housed in a centralized subrecipient master dashboard which reflects each step and item.

In addition to subrecipient agreements for direct service providers, MHB may subcontract with consultants and/or vendors (contractor) who provide general services related to other aspects of the grant. Beginning July 1, 2018, with any contractor MHB will utilize the small purchase methodology (when acquisition cost is greater than \$10,000 but less than \$150,000) whereby price or rate quotations will be obtained from at least two qualified sources and in full compliance with 2 CFR 200.321. In the unlikely event the acquisition costs exceed \$250,000, MHB will be in full accord with 2 CFR 200.323.