Community Investment Program (CIP) Policy Document

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Contents

1.	Definitions	. 3
2.	Technical Requirements	. 4
3.	Community Investment Program Information	. 4
4.	Policy Statement	. 4
5.	CIP Grant Principles	. 5
6.	Fund Review Process	. 7
7.	CIP Policies	. 8
	Appeals Policy	. 8
	Fund Reallocation Request Policy	. 9
	Grant Extension Policy	10
	Complaints Policy	11
	Fiscal Sponsor Policy	12
	Late Filing Policy	13
	Compliance Policy	15
	Recovery Policy	17

1. Definitions

- **Community Investment Program** is the funding program approved by the Region of Peel's Council as set out in the report entitled "Community Investment Program Review" dated May 1, 2019 and approved by Council Resolution 2019-436 dated May 9, 2019.
- **Incorporated not-for-profit organization** is a legal entity formed for the purpose of providing products or services to improve or benefit a community and does not earn any profits for its owners. Any profit must be used to further the goals, of the corporation.
- **Incorporated as a not-for-profit organizational for at least two years** The start date in which an organization was incorporated as a legal entity to the current date in which an organization is applying for a CIP fund.
- **Registered Charity** is a charitable organization that must use most of its resources for charitable activities. It must be registered under the Canada Revenue Agency under subsection 248(1) of the Income Tax Act (Canada) and abide by all its rules and regulations.
- **Ontario Humans Rights Code** The **Ontario Human Rights Code** prohibits discrimination against people based on protected grounds and protected social areas. See link above for list of protected grounds and social areas.
- **Political Organization** is an organization engaged in political activities such as campaigning, lobbying, community organizing, and advertising
- **GovGrants** is an electronic software technology used to administer funds, apply for funding, sign funding agreements, submit progress and reconciliation reports.
- **Service Provider Profile** The Service Provider Profile is in GovGrants, where agencies provide mandatory information about the organization, its board members and upload mandatory documents for the CIP to review.
- **Fiscal Sponsor** is a contractual relationship that allows a not-for-profit organization to advance charitable or other exempt activities with the benefit of the tax-exempt status of a sponsor organization. Fiscal sponsors provide oversight, financial management, and other administrative tasks to build the capacity of charitable projects.
- **Reconciliation Report** means the mid-term and year-end financial report which is to include all applicable invoices and receipts validating expenditures by the Community Service Provider and which is due by end of funding term. It is to demonstrate the actual expenditure of program funds as compared to the approved budget reflected in the Community Service Provider funding legal agreement.

2. Technical Requirements

You will need access to the following as it relates to the CIP Policy Document:

- Google Chrome is the required web browser to use GovGrants.
- Access to GovGrants, the CIP electronic software funding technology
- Email is the recommended way to communicate with the CIP at cip@peelregion.ca.

3. Community Investment Program Information

Information pertaining to funding streams, application guidelines, GovGrants and general CIP information can be accessed at **peelregion.ca/community-investments/**

4. Policy Statement

The Community Investment Program (CIP) believes that not-for-profit organizations and registered charities play a fundamental role in building healthy communities and providing critical services that lead to lasting contributions in Peel. The Region of Peel (ROP) understands the importance of supporting these organizations as they contribute to the ROP's Term of Council Priorities (TOCP). The Community Investment Program aligns to the ROP's TOCP strategy by providing grants to Peel's not-for-profit agencies that strengthen and improve their ability to operate and deliver quality programs and services through investments aligned to regional priorities. In addition, the CIP funds not-for-profits, and registered charities to support their operations, development, and collaborative partnerships.

Purpose

The purpose of this policy document is to:

- Inform community agencies of CIP program policies and procedures.
- Develop, implement, and maintain meaningful grant oversight
- Provide a concise method of applying for and managing grants

- Ensure funding decisions are consistent with CIP vision and mission
- Treat all organizations fairly and consistently
- Provide guidance to staff as it relates to associated policies, and procedures

5. CIP Grant Principles

To ensure that all CIP funding frameworks, strategies, and review processes are adhering to the utmost integrity, transparency and relevancy, the CIP program is guided by the following key principles:

- Equity, Diversity & Inclusion
- Transparency
- Agency Centred
- Accountability
- Results Oriented
- Fairness
- Alignment to Regional Priorities

Equity, Diversity, and Inclusion

The CIP acknowledges that systems of structural oppression and discrimination impact individuals, communities and organizations engaged in this work. Therefore, it is committed to be inclusive, and will neither discriminate nor tolerate any form of discrimination based on race, ethnicity, religion, age, sexual orientation, socio-economic status, or disability. The CIP is committed to applying an equity lens to the funding program to ensure that the diversity of our local service providers and community are reflected in CIP decision-making, grant opportunities that are rewarded, and policies. The CIP will continue to tailor its approach to ensure an ongoing improvement in the areas of equity, diversity, and inclusion in its funding program and service delivery. The CIP will ensure an equity lens is applied to performance measurement criteria, with input from not-for-profits to ensure it reflects the type of work being invested in and that they do not create barriers.

Transparency

The CIP recognizes the importance of making information available about what we do and why we do it and aims to make information easy to find and accessible. The CIP will ensure that all fund related documents, and decision-making procedures are readily available on departmental web sites. The CIP will ensure that information on grants amounts awarded each year is available to foster greater transparency, openness and to show how taxpayer dollars are spent.

Alignment to Regional Priorities

The CIP program ensures that funded agencies are aligned to Regional Priorities and that regional alignment is clearly articulated in application guidelines.

Accountability

Each year, the CIP reports to Regional Council on how the funds were used to meet Regional and program objectives. The CIP implemented GovGrants, a fund management system that is accountability focused where all fund related documents are stored. All grants are required to adhere to the performance conditions specified in the CIP Funding Agreements and may be subject to an audit.

Results Oriented

All Region of Peel Community Investment funding will have relevant measurable indicators that are informed and guided by proven, effective best practices. The CIP identifies critical metrics to measure the progress of each fund. The CIP ensures that all initiatives, investments, and partnerships are contributing to maximizing positive impact on communities.

Fairness

The CIP uses a grant management system that ensures an efficient grant review process is being implemented. The CIP uses a grant review process that is a fair and unbiased assessment of funding applications. The CIP ensures that applicants are regularly informed throughout the review process.

Agency Centred

The CIP focuses not just on needs but also on the assets and capacities of our not-for-profit agencies.

6. Fund Review Process

All CIP funds utilize a Fund Review Committee that consists of Internal staff members from various departments across the Region of Peel. The CIP has also utilized external reviewers with extensive experience reviewing funding applications. Reviewers are trained on the GovGrants online platform and go through a thorough training on how to evaluate applications, understanding program guidelines, and alignment with Regional Priorities. Reviewers are provided with tools to support the review process. Each application that meets the general eligibility requirements will be reviewed by the Fund Review Committee.

Eligible applications are reviewed against the program guidelines and assessed based on demonstrated need, financial sustainability, regional priority alignment, anticipated outcomes, and sustainability. Each application is scored by two reviewers with the average of the two scores taken as the final score. Based on the recommendations made by the application reviewers, the CIP Team members discuss the relative merit of the application by urgency of funding by request.

To assist with the financial assessment of Peel not-for-profit agencies applications, the Regional Finance Support Unit (FSU) completes and scores the financial assessment for all applications. The FSU reviews financial statements submitted by the applicants and analyzes risk factors and financial ratios that are grouped into the following categories: (Liquidity, Leverage, Profitability, Revenue, and Expenditures). If a financial score is deemed high risk, the applicant may not be recommended for funding.

CIP Management Team reviews all applications based on identified thresholds, alignment of outcomes with priorities, and proposes an amount for funding. The CIP management team then implements each fund's respective allocation strategy. The Director, of Social Development, Planning and Partnerships is briefed on the CIP funding recommendations and reviews and approves final funding allocations. Once the Director approves, CIP provides a funding update to applicants, within six-eight weeks from the fund close date.

7. CIP Policies

Appeals Policy

Purpose:

The purpose of the appeals policy is to provide unsuccessful CIP fund applicants with the opportunity to appeal funding decisions. The CIP strives to provide equitable treatment of applications and funding decisions.

Policy:

Appeals can only be requested by the primary applicant of the Service Provider Profile in GovGrants, the Region of Peel's fund management system. Appeals will not be accepted for the following reasons:

- Application deemed ineligible/incomplete application
- Mandatory documents were not submitted by the application deadline
- Eligibility requirements specified in application guidelines not met.

Appeals Policy Procedure

Step 1

Appeals must be submitted in writing by email to <u>cip@peelregion.ca</u> within 5 business days of receiving a funding decision letter and should clearly explain the rationale for the appeal. Appeals can be made for the following reasons:

- Evidence of an error in, or deviation from, CIP fund assessment process & criteria.
- Undeclared conflict of interest

Step 2

The appeal will be reviewed by the Supervisor, Community Investment Program, Social Development Planning and Partnerships Division.

Step 3

The Supervisor will:

- Request additional information or schedule a meeting with the agency to discuss further.
- Advise of appeal result in writing within 5 business days of receiving the appeal.

If an agency disagrees with an appeal decision, they can escalate the decision to the Manager of Community Capacity and Investment. The manager will review the supervisor's decision and follow up with the agency in writing within 5 business days.

Note: Appeals will be managed confidentially.

Fund Reallocation Request Policy

Purpose:

The Fund Reallocation Request Policy defines the CIP's process to modify grants awarded to agencies based on the approved budget categories associated with a specific fund.

Policy:

CIP contracts outline the approved budget categories specific to each fund and agencies are required to complete reconciliation documents to verify how funds were spent on the approved budget categories.

Agencies can reallocate funding received up to 10% between approved budget categories without CIP approval, as indicated in the funding agreement. When completing reconciliations, agencies must mention in the budget narrative of the reconciliation report the amount of funds reallocated and to which budget category.

Funds greater than 10% can only be reallocated to other approved budget categories with written approval from the CIP.

The Fund Reallocation Request Form should be completed by the primary applicant of the Service Provider Profile in GovGrants, the Region of Peel's fund management system.

Fund Reallocation Request Policy Procedure

Step 1

Send an email to <u>cip@peelregion.ca</u> with a completed reallocation request Form (refer to appendix A). In the reallocation request form, you will be required to provide the following information:

 Provide in detail an explanation of why you are requesting to reallocate your funds. In your explanation, ensure your description provides an explanation of the circumstances that led to this reallocation of funding.

- Explanation of which budget categories you would like to move funds between.
- The amount of funds you are requesting to reallocate.
- Any documentation to support your request.

The Supervisor, Community Investment Program will complete the approval section of the reallocation request form with a decision regarding the request within 5 business days and will return it to the agency via email.

Grant Extension Policy

Purpose:

The Grant Extension Policy defines the CIP's process for agencies to request an extension for timelines outlined in funding contracts.

Policy:

Extension requests cannot exceed 30 days.

An agency can request an extension for the following reasons:

- Extension to use approved funds beyond the budget period.
- Extension to submit completed progress reports
- Extension to submit completed reconciliation reports

The Grant Extension Request Form can only be completed by the primary applicant of the Service Provider Profile in GovGrants, the Region of Peel's fund management system.

Grant Extension Policy Procedure

Step 1

Send an email to <u>cip@peelregion.ca</u> with a completed Grant Extension Request Form (refer to Appendix B). In the Grant Extension Request Form, you will be required to provide the following information:

- Indicate the type of extension requested
 - A. Extension to use funds beyond the approved budget period.

- B. Extension to submit a completed progress report
- C. Extension to submit a completed reconciliation report.
- Provide in detail an explanation of why you are requesting an extension. Ensure
 your description provides an explanation of the circumstances that led to this
 extension request.
- The length of the extension request (Maximum of 30 days)
- Any funds to be carried over in the extended grant period
- Any documentation to support your request.

The Supervisor, of Community Development will complete the approval section of the Grant Extension Request form with a decision regarding the request within 5 business days and return it to the agency via email.

Complaints Policy

Purpose:

The purpose of the Complaints Policy is to describe how agencies can bring forward complaints about the CIP. The complaints process applies to both CIP funded agencies and agencies that have applied and were not recommended for funding.

Policy:

The Community Investment Program will ensure a timely resolution to complaints and that they are addressed as soon as possible. If you have a complaint, the CIP will be pleased to address it using the process below.

Compliants Policy Procedure

Step 1

Send an email to <u>cip@peelregion.ca</u> with the details regarding your complaint. Your complaint will be forwarded directly to the Supervisor, Community Investment Program.

Please include the following information:

- 1. Complainant's name and contact information
- 2. Details of the complaint

3. Any action steps the complainant is looking for CIP to take to address the issue.

Step 2

The supervisor Community Investment Program will review the complaint and respond to the agency within 5 business days.

Step 3

If the complaint remains unresolved to the satisfaction of the complainant, the agency may escalate the complaint to the Manager of Community Capacity and Investment. The agency can email cip@peelregion.ca and ask that the complaint be forwarded to the manager. The manager will review the supervisor's response and will follow up with the complainant within 3 business days of receiving details of the complaint.

Step 4

Complaints that cannot be resolved by the supervisor and manager will be brought to the attention by email from the manager to the Director of, Social Development Planning and Partnerships Division. The Director will address the complaint or define a process to address the complaint. The agency will receive a follow-up email with a response regarding the complaint.

Fiscal Sponsor Policy

Purpose:

The purpose of fiscal sponsor policy is to outline what is required of a not-for-profit organization to use a fiscal sponsor to apply for a Community Investment Program Fund.

What Does a Fiscal Sponsor Do as it relates to the Community Investment Program?

- Performs administrative functions on behalf of the sponsored organization.
- Completes progress reports and reconciliations reports
- Signs contract and complies with terms and conditions set out in funding the agreement.
- Manages disbursement of funds to sponsored organizations.

Policy:

The lead organization (also known as the fiscal sponsor) must apply on behalf of all sponsored parties through GovGrants, meet all eligibility requirements and comply with funding agreement.

Fiscal Sponsor Policy Procedure

Step 1

Read application guidelines to see if a fiscal sponsor can be used for that specific fund as not all CIP funds allow a fiscal sponsor.

The fiscal sponsor must be a registered charity and meet all eligibility requirements outlined in the application guideline specific to each fund.

The fiscal sponsor must provide the 2 most recent years of audited financial statements if the organizational revenue is greater than \$250,000. If the organizational revenue is between \$150,000 and \$250,000, a Review of Engagement may be submitted. If the organizational revenue is less than \$150,000, a Notice to Reader may be submitted. The fiscal sponsor must also provide proof of insurance.

Step 2

The lead organization (also known as the fiscal sponsor) must submit the application on behalf of all parties through GovGrants. The lead organization will sign the contract with the Region of Peel if the application is approved for funding.

Step 3

Remember to include examples of governance and operation-related documents that the fiscal sponsor has in place with the sponsored organization (i.e., conflict resolution, Memorandum of Understanding, and or partnership agreement).

The agreement between the fiscal sponsor and sponsored organization should indicate that the fiscal sponsor is responsible for compliance related to receiving funds on behalf of the sponsored organization and completing mandatory reports.

Important: A written agreement between the sponsor (a registered charity) and not-for-profit organization is mandatory. The CIP has a template that agencies can use as a partnership agreement (see Appendix C). The written agreement can be uploaded to the attachments tab of the application in GovGrants.

Late Filing Policy

Purpose:

There are contractual obligations for agencies who receive funding from the ROP Community Investment Program, and one of the obligations is completing the reconciliation and progress reports. Reconciliation and progress reports must be completed by the specified

timeline outlined in your funding service agreement. The CIP acknowledges that most funded agencies complete the reporting and related information on a timely basis.

The intent behind the late filing process outlined below is to ensure the CIP has the information required to demonstrate accountability of public funds. We will continue to support funded agencies with training and resources to complete these reports through GovGrants.

Policy:

The progress reports shall be in such form and contain such information as may be specified by the Region and the receipt of further installments of the Funding may be conditional on the receipt of the progress report and of satisfactory proof of use of previous installments of Funding.

The Community Service Provider shall provide the Region, no later than thirty (30) Days following the end date of the Funding Period with final results regarding the use of the Grant funds as specified by the Region.

The Community Investment Program may delay the release of funding for other funds that have been approved if reporting has not been completed as outlined in the contracts and may reallocate funding to another agency.

Late Filing Policy Procedure

Where an agency submits after the filing deadline, the Region of Peel will take the following action until the report(s) have been received.

Step 1

The Community Investment Program will inform the agency that the submission is overdue by email and phone call. Therefore, it is important to ensure the Service Provider Profile has the current Primary User contact information entered on GovGrants.

Step 2

If the reporting requirements have not been met within four weeks past the due date, the Community Investment Program may withhold future payments.

Step 3

Upon submission of the requirements, the Community Investment Program will revert to the normal payment schedule, including any payments that were on hold.

If the reporting requirements have not been met within six weeks past the due date, funding may be reallocated.

Compliance Policy

Purpose:

The purpose of the compliance policy is to ensure that agencies adhere to laws, regulations, guidelines, and processes of the Region of Peel and Community Investment Program.

Policy:

The Region has the general power pursuant to section 107 of the Municipal Act, 2001, S.O. 2001, c. 25 to make grants, including the power to make grants by way of loan on such terms as security and otherwise as its council considers appropriate to any person, group or body, including a fund, within or outside the boundaries of the Region for any purpose that is in the interests of the Region.

The Region's Community Investment Program provides funding to not-for-profit agencies to help build the capacity of the sector and better deliver community and social services in Peel Region.

It is the responsibility of fund recipients to thoroughly review and comply with all the terms and conditions of funding agreements with the Regional Municipality of Peel.

Compliance Policy Procedure

Step 1

The following articles should be reviewed before signing a funding agreement, and agencies must comply with these as a condition of signing any contract with the Community Investment Program. Only agencies that have been approved for funding will have access to the funding agreement containing the articles below.

- Article 1: Interpretation
- Article 2: Term
- Article 3: Purpose
- Article 4: Grant, Repayment

- Article 5: Conditions Precedent to Advancing Funding
- Article 6: Disbursement of Funding
- Article 7: Appropriate, Cancellation or Reduction of Grant
- Article 8: Final Capital Costs Audit and Reporting
- Article 9: Representation and Warranties
- Article 10: General Obligations of Community Service Provider
- Article 11: Preservation and Disposition of Assets
- Article 12: Financial Records, Right to Audit
- Article 13: License of Intellectual Property
- Article 14: Contract Procedures
- Article 15: Non-Liability of the Region
- Article 16: Indemnification
- Article 17: Insurance
- Article 18: Termination for Default
- Article 19: Right of Early Termination of Agreement by Region for Convenience
- Article 20: Lobbyist's Registration and Lobbyists Contingency Fees
- Article 21: Conflict of Interest
- Article 22: Interest Earned on Grant
- Article 23: Repayment of Overpayments, Unexpended Balances and Disallowed Expenses
- Article 24: Public Acknowledgement of the Region's Contribution
- Article 25: Notices
- Article 26: Dispute Resolution
- Article 27: General Provisions.

Once the articles have been reviewed and the contract is signed, agencies will be required to comply with everything outlined in the funding agreement.

Recovery Policy

Purpose:

The purpose of the Recovery Policy is to provide agencies with direction on returning grant funds to the Region of Peel.

Policy:

Grant amounts are provided as set out in the Schedule(s) attached to funding agreements with the Region of Peel. Any part of a Grant shall only be used by the Community Service Provider for Eligible Costs for the Project incurred and expended by the Community Service Provider during the Funding Period. Amounts not fully used according to the Schedule in the Funding Period shall be returned to the Region within thirty (30) days of the end of either a particular Grant term, as set out in the respective Schedule, or the Funding Period, whichever is sooner.

If a surplus is reported, the Community Service Provider must provide an explanation for the surplus and proof of return of the surplus funds to The Regional Municipality of Peel. A Community Service Provider may request to allocate a surplus from one Eligible Cost line item to a deficit in another Eligible Cost line item. A Community Service Provider must receive express approval from the Region prior to effecting any such reallocation. (Please review the Fund Reallocation Request Policy).

An annual financial report (CIP Reconciliation Report including all applicable invoices and receipts over \$500.00 validating project expenditures) is due thirty (30) days after the end of either a particular Grant term, as set out in the respective Schedule, or the Funding Period.

Recovery Policy Procedure

Note: if you complete a final reconciliation report and you have underspent funds, GovGrants will automatically send an email to the primary contact indicating a payment amount owing to the Region. The email will state: **Please Do Not send a cheque to the Region. The payment amount stated will be reflected in future payments.** Please disregard this message as you will be required to follow the steps below and return payment to the Region within 30 days.

Step 1

Please send an email to <u>cip@peelregion.ca</u> indicating that you would like to receive a clawback letter with instructions on how to return funds to the Region.

A clawback letter will be sent to you with instructions on how to make payment through your banking institution.

Step 2

Send an email to **cip@peelregion.ca** confirming that underspent funds have been returned.

Step 3

You will receive an email from the CIP confirming receipt of funds.



peelregion.ca/community-investments/