



The Headwaters Fund

INVESTING IN OUR COMMUNITY

Grant Fund Manual

TABLE OF CONTENTS

1.	Introduction and Summary	3
2.	Definitions.....	3
3.	Mission and Goals.....	3
4.	Financial Management.....	3
5.	Award Amounts and Types	4
6.	Organizational Eligibility for Funding.....	5
7.	Costs Eligible for Funding and Funding Match.....	5
8.	Providing Information and Marketing to the Public.....	6
9.	Applications Processing Overview – Competitive Awards.....	6
10.	Applications Processing Detail – Competitive Awards.....	6
11.	Selection of Grants – Competitive Awards	7
12.	Applications Processing – Discretionary Awards.....	7
13.	Selection of Grants – Discretionary Awards	8
14.	Rejection of Grant Applications	8
15.	Appeal of Grant Applications Denied by Staff.....	8
16.	Conflict of Interest Policies	8
17.	Grant Notification and Contract.....	9
18.	Grant Payment	9
19.	Grant Reporting, Monitoring, and Evaluation	9
20.	Grant Modifications	10
21.	Grant Closing.....	10
22.	Suspension and Termination of Grants.....	11
23.	Grant and Applications File Tracking.....	11
24.	Use of Consultants	12
25.	Grant Fund Evaluation.....	12
26.	Changes to Grant Program Policies and Procedures.....	12
27.	Extraordinary Project Criteria.....	12

1. Introduction and Summary

- a) This Manual governs the administration of the Headwaters Grant Fund.
- b) The Grant Fund is for non-profits and governments in Humboldt County to conduct projects to improve the economy of Humboldt. Funding for the Grant Fund is generally provided by interest earnings from the corpus of the Headwaters Fund and the net return from the Headwaters Revolving Loan Fund (if available). The Grant Fund will generally make up to \$300,000 in grants annually over one to three grant cycles.

2. Definitions

- a) “HWF” means the Headwaters Fund program.
- b) “HFB” means the Headwaters Fund Board.
- c) “BOS” means the Humboldt County Board of Supervisors.
- d) “GF” means the Headwaters Fund Grant Fund program.
- e) “Staff” means the County of Humboldt’s Economic Development Division staff administering the Headwaters Fund.
- f) “IT” means information technology systems.

3. Mission and Goals

- a) The Mission of the Headwaters Grant Fund is to improve the economy of Humboldt County.
- b) The initial, primary funding focus will be supporting projects benefiting base industries in Humboldt County, encouraging, though not exclusively, projects identified in industry cluster workplans or developed cooperatively within or between industry clusters. The Grant Fund will fund only projects in the above focus. However, exceptions may be considered for projects that provide extraordinary benefit to base industries, including those not explicitly named in the Prosperity! strategy.
 - i) Base industries are defined as industries that bring dollars into Humboldt County through sales to customers outside of the County.
 - ii) The Prosperity! strategy is the County’s Comprehensive Economic Development Strategy.
- c) The Grant Fund will strive to increase inflows of external funding into the County by requiring outside funding sources to match GF funding where possible.

4. Financial Management

- a) Management of funds will be conducted by the County Treasurer-Tax Collector and County Auditor.
- b) Staff will monitor cash flows and prepare financial reports for HFB and BOS review. The formula below reflects the budget methodology to use to insure the principal is not spent in order to manage the fund in the most consistent manner possible. The calculation takes the fund balances, with the exception of the Community Investment Fund, and reduces it by the projected operation costs, loan losses and new grant allocations. If the result is greater than \$13.4 million, then the proposed budget is within the manual guidance.

“Fund Balances* Less Proposed budget** must be greater than the principal limit (\$13.4 mil)

*Endowment, Liquidity, Revolving Loan, Loan Reserve, Grant, Initiative Funds

** Operations, Loan losses from prior year, grant making allocation

- c) The funds to administer and disburse under the Headwaters Grant Fund will be recommended by HFB and determined by the BOS. Any amount allocated to GF

disbursements but not disbursed during a particular grant cycle will return to the Headwaters Liquidity Fund.

5. Award Amounts and Types

- a) Interest income from the “Liquidity Fund” and net return from the “Revolving Loan Fund” fund GF grants. The amount available for grants will vary depending on rates of return. Approximately \$200,000 – 500,000 will be available annually for grants. There is no requirement to disburse the entire amount available during a particular grant cycle or year. Any undisbursed funds for a particular grant cycle or year will be placed in a Grant Fund carry-over pool for future years of Grant Fund disbursements. Interest earnings in the Grant Fund carry-over pool will accrue to the Headwaters Liquidity Fund.
- b) Mini-Grant Awards
 - i) \$20,000 will be allocated annually made at the discretion of HFB and staff. For awards of \$2,500 or less, HFB will determine an approval process that may include approval by staff in consultation with an assigned HFB Member. Awards over \$2,500 will be approved by the full HFB. No formal application will be required, but staff will require a formal letter of interest and budget. BOS will receive a report on all individual allocations, but will not approve individual Mini-Grant Awards.
 - ii) Awards will be made on an ongoing, as needed basis until allocated funds are exhausted.
 - iii) The availability of Mini-Grant Awards and application processes will be marketed to the general public. The awards will be promoted through press releases, the Headwaters Fund website, staff, board members, and community partners. A brief description of the funds and how to apply will be available for distribution. Mini-Grant Awards will be granted for:
 - a) Community economic development events;
 - b) Projects furthering the County Economic Development strategy; and
 - c) Local representation at regional, national or state events important to economic development strategy implementation, early project development, or regional economic and community development planning.
- c) Competitive Awards
 - i) Unsolicited proposals will be awarded through the Competitive Awards program. A formal application process is required (see Section 10: Applications Processing Detail – Competitive Awards). All awards will be approved by HFB and BOS.
 - ii) The maximum project size will be \$100,000, although exceptions may be made for unique projects with exceptional impacts in the Funding Focus area.
 - iii) Awards will be made up to three times a year.
- d) Grant Initiative Fund
 - i) In 2008, \$638,405 was initially set aside as a pro-active grant initiative fund. The HFB will select a priority economic development area within the Prosperity! Strategy and the HWF Charter goals and develop a strategy, an initiative steering committee (comprised of the HFB in whole or part), commit staff resources and launch and staff each identified initiative. The Board of Supervisors will approve each initiative before it starts and will approve all grant awards.

- ii) The initiative fund will continue to be funded from two sources: Revolving Loan Fund (RLF) interest and unspent grant funds (interest) from the Liquidity Fund. Annual and all previously accrued interest from the RLF program will be the primary source of funding for the initiative grant program. Any un-granted monies from the Grant Fund are available for Grant Fund Initiative projects.

6. Organizational Eligibility for Funding

- a) Non-profit organizations, including, without limitation, 501c organizations as well as California registered unincorporated nonprofit associations, non-profit public benefit corporation and mutual benefit corporations. The Project Selection Criteria document (created by HFB) outlines specific eligibility criteria.
- b) Government jurisdictions located in Humboldt County are eligible for Grant Fund grants.
- c) The following are ineligible to apply for funding: political lobbying groups (including all 527 organizations), individuals, and businesses.

7. Costs Eligible for Funding and Funding Match

- a) Eligible costs: Projects must benefit Humboldt County. All costs are eligible, except the following:
 - i) Debt or recovery of expenses already incurred;
 - ii) Supplanting of government funds (costs formerly covered by government may be included only if the government funding is no longer available); and
 - iii) Purchases of capital equipment or property that will be or become privately owned; however, small incentives, promotional items, and equipment purchases under \$1,000 for businesses and individuals are eligible.
 - iv) Lobbying activities including, without limitations, carrying on political propaganda or otherwise attempting to influence legislation; influencing the outcome of any specific public election; carrying on, directly or indirectly, any voter registration drive.
 - v) Causing any private inurement or improper benefit to occur.
 - vi) Terrorist activity.
- b) Matching Funds
 - i) Competitive Awards require matching funds from non-HWF sources. Implementation grants will be for 50% or less of total project costs. Planning grants will be for 75% or less of total project costs.
 - ii) Documentation of other outside project funding is required and may take the form of:
 - a) A copy of grant award letter/contract from other funder(s) showing award amount, costs covered, budget, project description, and other information;
 - b) A copy of organization's approved budget documenting dedicated project funds; or
 - c) If matching funds are not in-hand, and HWF support will be used to garner outside funding, then applicant must provide a detailed fundraising/grantwriting plan, including a listing of potential funding sources, progress to date for each source, competitive position for each source, timeline, and commitments made. A letter committing HWF

funds, contingent upon receiving other funding, will be provided by the HFB. However funds will not be distributed prior to submission of proof of receipt of matching funds.

- c) Grantees shall maintain records of all project costs that are claimed by the grantee as being covered by HWF and other funder(s). Such records are subject to audit (Section 21: Grant Closing Section).
- d) If, following receipt of an award, a grantee determines that funding from other source(s) can no longer be used, HWF funding may be reduced, suspended or terminated; the grantee must contact HWF staff immediately. Any HWF-approved adjustments to cash match commitments are made based on the grantee's rationale behind the requested adjustment and on a case-by-case basis.

8. Providing Information and Marketing to the Public

- a) Marketing
 - i) HWF staff will work to publicize availability of funds to the community along with selection criteria and fund performance. Marketing may include advertising, website, marketing collateral, application and material distribution, and potential applicant training.
 - ii) Staff and HFB will recommend a marketing budget to BOS.
- b) Information materials
 - i) HWF Staff will make the following information readily available (in print and/or online formats) to the public: Grant Fund mission, contact information, funding priorities and limitations, number and average size of grants, percentage of unsolicited proposal funded, application information, grantmaking criteria, and decision-making process.
 - ii) Community Benefits Annual Report: This public report will highlight Grant Fund operations, finances, and performance. The Report will also include a list of the previous year's grantees and the award amount.
- c) Requests for funding
 - i) Competitive Award funding requests must take the form of the official GF application.
 - ii) Letters and emails will be accepted for Discretionary Awards.

9. Applications Processing Overview – Competitive Awards

- a) Applicants will submit a written application to the Headwaters Fund Coordinator who will conduct an initial screening. The Coordinator will deny applications that are outside stated funding priorities, conduct due diligence on the remaining applications (time permitting), and forward these remaining applications to HFB for review. HFB will review and assemble a slate of applications recommended for BOS approval. BOS will vote to approve the entire slate or deny individual projects within the slate.

10. Applications Processing Detail – Competitive Awards

- a) Applicants will submit a written application to the Headwaters Fund Coordinator.
- b) Applications deadlines will be set by HWF staff and/or the Headwaters Fund Board.
- c) Applicants must complete the application package.
- d) Initial screening: HWF staff will conduct an initial screening of an application and categorize it as “outside of stated funding priorities,” “meriting further review,” or “incomplete”.
 - i) Applications outside of stated funding priorities: These applications will be declined promptly in a letter.

- ii) Applications meriting review: These applications will be reviewed by HWF staff and passed along to HFB for evaluation.
- iii) Incomplete applications will not be accepted.
- e) Pre-grant review by staff
 - i) Staff will review Competitive Award applications meriting further review (Discretionary Awards will have much lighter reviews). Staff will present HFB with applications that have a reasonable chance of approval according to Selection Criteria. The review may include the following:
 - a) Assessment of managerial competence and fiscal accountability;
 - b) Review of proposal and budget for internal consistency and compliance with HWF policies (e.g. cash match);
 - c) Review of previous grants performance of applicant organization;
 - d) Cross-grant comparison/analysis of proposal and organization;
 - e) Evaluation of outside reviews of proposed project (if available).
 - ii) Docket preparation for HFB review
 - a) A docket will summarize key information about an application for HFB review.

11. Selection of Grants – Competitive Awards

- a) Selection criteria (see “Project Selection Criteria” document created by HFB).
- b) HFB selection process: Competitive Awards
 - i) HWF staff will present dockets of applications that merit further review to HFB. Each HFB member will use the selection criteria to rank each application and list reasons for rankings;
 - ii) The HFB will use the decision making process outlined in the Grant Fund Decision-Making document (to be created by HFB); and
 - iii) HFB will recommend a slate of grants to be funded for Board of Supervisor approval. HFB decisions on grants cannot be appealed by applicants.
- c) Board of Supervisor approval
 - i) The BOS will use a majority vote to approve the entire slate presented by the HFB. BOS may not add projects to the slate being approved, but may recommend additional review of individual projects. Upon majority vote, Supervisors may pull one or more projects from the slate and approve the remaining slate of projects. Supervisors would refer pulled projects back to the HFB and Staff with questions and comments. Staff and HFB would respond to BOS comments on any pulled projects. After BOS receives this response, BOS would approve or deny individually pulled projects according to a majority vote. BOS decisions on grants cannot be appealed by applicants.

12. Applications Processing – Discretionary Awards

- a) Applicants will submit a written request to the Headwaters Fund Coordinator.
- b) Deadlines: Applications will be accepted year-round.
- c) Request contents
 - i) Letters and emails which include the following information will be accepted: Overview of project, including purpose and expected outcomes; project budget and amount requested from HWF; project schedule; and organization’s/staff’s qualifications. A one-page hand-out describing Discretionary Awards and the request process will be available for applicants.
- d) Initial screening: HWF staff will conduct an initial screening of an application and categorize it as “outside of stated funding priorities,” “meriting further review,” or “incomplete”.

- i) Applications outside of stated funding priorities: These applications will be declined promptly in a letter.
 - ii) Applications meriting review: These applications will be reviewed by HWF staff and passed along to HFB for evaluation.
 - iii) Incomplete applications will not be accepted.
 - e) Pre-grant due diligence review
 - i) Discretionary Awards will have little or no review by Staff. Staff will present HFB (or its representative as stated in the next section) with applications that have a reasonable chance of approval according to Selection Criteria to be developed by HFB.

13. Selection of Grants – Discretionary Awards

- a) Selection criteria (see Project Selection Criteria document to be created by HFB).
- b) Selection process
 - i) HFB will recommend a process for selection and distribution of Discretionary Awards to be approved by BOS.

14. Rejection of Grant Applications

- a) Staff will send a notification letter to applicants rejected by Staff or HFB. The letter will list general reasons for rejection when it will help the applicant in a future application to HWF.

15. Appeal of Grant Applications Denied by Staff

- a) Competitive Awards: Appeals
 - i) Applications deemed ‘outside of stated funding priorities’ and rejected by the Headwaters Coordinator, without HFB review, may be appealed. The appeal will be for inclusion in the next grant review cycle by HFB. The appeals process is as follows:
 - a) Within 30 days of the decline notice date, the applicant must submit a Request for Appeal and a check for \$250 to cover appeal processing and Staff report costs.
 - b) Within 30 days of receiving the Request for Appeal, Staff will respond with reasons the application was rejected and information required, or other necessary conditions, for the application to be reviewed by HFB.
 - c) Within 30 days of receiving the Staff’s response, the applicant will submit an Appeal Summary to address all issues listed by Staff. The original application and the Appeal Summary will then be submitted to HFB at the next regularly scheduled grant review meeting.
 - ii) HFB decisions on grants cannot be appealed by applicants. Applicants will be advised of application deficiencies and advised to re-submit an improved application in the next round, if appropriate.
 - iii) BOS decisions on grants cannot be appealed by applicants.
- b) Discretionary Awards: There is no right of appeal for Discretionary Awards..

16. Conflict of Interest Policies

- a) This Policy covers economic conflicts of interest (as defined in California Government Code 8100 et. seq.; and Humboldt County Ordinance) and other conflicts of interest. Any HFB Member or HWF Staff who has an interest in a contract or other transaction presented to HFB or a committee thereof for authorization, approval, or ratification shall make a prompt and full disclosure of his/her interest to HFB or committee prior to its acting on such contract or transaction. Such disclosure shall include any relevant and

material facts known to such person about the contract or transaction and the nature of the potential conflict. Said person will recuse himself/herself from decision-making, voting, and using personal influence in the discussions with respect to such contract or transaction. Such person may be counted in determining whether a quorum is present for the Board meeting but may not be counted when the Board or a committee of the Board takes action on the transaction. The minutes of the meeting shall reflect the disclosure made, the vote thereon, the abstention from voting and participation, and whether a quorum was present.

17. Grant Notification and Contract

- a) A letter will be sent to grantees selected for funding to notify them of approval. Among other things, the letter will specify reporting requirements and funds disbursement terms.
- b) A contract between the grantee and the County will need to be signed. An appropriate signatory on behalf of the grantee would be the Board Chair, President, authorized executive officer, or other comparable person. The contract will detail terms of the agreement, the purpose of the grant, the scope of work, amount of award, duration, payment schedule, and reporting requirements.
- c) The contract must be executed within 6 months of the grant award. The grantee may request an extension in writing for extenuating circumstances. If the extension request is for more than a year from the award date, the extension requires HFB approval.

18. Grant Payment

- a) For each award, HWF staff will determine a payment schedule with advice from the HFB. Payment options are outlined below.
 - i) Payment in lump-sum upon signing of contract;
 - ii) Payment in installments (by schedule or milestone reached) and contingent on receipt of grantee reports; or
 - iii) Payment on a re-imbusement basis, with full report and accounting by grantee.
- b) 10% of grantee award will be held by HWF, pending receipt of appropriate final deliverable documents from the grantee.

19. Grant Reporting, Monitoring, and Evaluation

- a) Monitoring refers to compliance with contract commitments and fund uses, while evaluation refers to measuring the extent to which the grantee met the objectives outlined in the grant application. The goal of grant monitoring is to ensure grantee work complies with HWF requirements.
- b) Grantee reporting requirements – Competitive Awards
 - i) Grantee is required to submit quarterly monitoring reports that include:
 - a) Documentation of activities contracted and completed with grant funds;
 - b) Financial accounting of grant funds. Grant funds should be tracked separately. Receipts documenting purchases may be requested;
 - c) Sub-contracts signed and/or completed;
 - d) Narrative of accomplishments to date and schedule of activities and expected completion date;
 - e) Progress on meeting match requirements, fundraising activity report; and
 - f) Requests for revisions of timeline, budget, etc.
- c) Grantee reporting requirements – Discretionary Awards
 - i) Reporting requirements for Discretionary Awards will be lighter than for Competitive Awards. Specific requirements will be outlined in the Grant Contract, but typical requirements may include the following at the completion of the project:

- a) Documentation of activities contracted and completed with grant funds;
- b) Financial accounting of grant funds. Grant funds should be tracked separately. Receipts documenting purchases may be requested; and
- c) Narrative of accomplishments to date and schedule of activities and expected completion date;
- d) Grant evaluation
 - i) HFB may choose to evaluate individual or groups of projects.
 - ii) Grantees may be required to include an evaluation and an evaluation budget in their project plans and budget.
 - iii) HWF staff and HFB, or its authorized representatives, has the right to make site visits to review project accomplishments, grantee management control systems and administration and management of the grant. The HWF staff or its representatives will make at least one site visit during the grant period (for Competitive Awards). When any site visit is made by HWF staff on the premises of the grantee under a grant, the grantee shall provide and shall require its sub-contractors to provide all reasonable facilities and assistance for the safety and convenience of the HWF representatives.

20. Grant Modifications

- a) All grant contract changes must be requested and approved in writing as outlined in this section.
- b) Staff may adjust changes in grant timelines, activities, and partners that are consistent with original project goals, target populations, and geographical focus. Changes in project goals, target population, and geographic focus must be approved by the HFB.
- c) Budget revisions/reallocations
 - i) Staff may approve budget changes under \$10,000.
 - ii) Budget changes of \$10,000 or more require HFB approval.
- d) Extensions: If additional time beyond the timeline provided by the grantee is required and exceptional circumstances warrant, a formal request must be submitted to HWF Staff. The request must be submitted at least 45 days prior to the expiration date of the grant. The request must explain the need for the extension and include an estimate of the un-obligated funds remaining and a plan for their use. As indicated above, un-obligated funds remaining at the expiration of the grant is not sufficient justification for an extension. The plan must adhere to the previously approved objectives of the project.
- e) Organization/personnel changes: If key project personnel do or plan to: (a) devote substantially less time to the project than anticipated in the approved proposal; (b) sever their connection with the grantee organization; or (c) otherwise relinquish active direction of the project, the grantee shall immediately notify HWF Staff of the situation. HWF Staff will take appropriate action including transferring the grant, amending the project, or terminating the grant.
- f) Additional funding due to increased expenditures: Generally, grantees are not eligible for additional funds above the agreed upon grant award.
- g) Refunds: Unused grant funds will be returned to the HWF with no negative consequences for future applications as long as all reasonable efforts were made to execute the project within the proposed budget in a timely manner.

21. Grant Closing

- a) The following grant closing requirements apply to Competitive Awards and may be relaxed for Discretionary Awards.
- b) Grant closing occurs after all grant payments and reporting requirements have been fulfilled. Closing will occur within 90 days after the final payment.

- c) Notification of reporting obligation fulfillment
 - i) A Grant Closeout letter will be sent to the Grantee at the end of the project. When the Grantee returns the letter, the Grant is considered closed.
- d) Evaluation of grant (see Section: 19: Grant Reporting, Monitoring, and Evaluation)
- e) Grantee record keeping requirements
 - i) Financial records, supporting documents, statistical records and other records pertinent to a grant will be retained by the grantee for at least 4 years from submission of the Final Project Report/Grant Closeout letter, with the following exceptions: Records related to audits, appeals, litigation or the settlement of claims arising out of the performance of the project will be retained until such audits, appeals, litigation or claims have been disposed of; and
 - ii) Grantee shall retain and HWF Staff shall have access to any pertinent books, documents, papers and records of the grantee organization (and of the performing organization, if different) to make audits, examinations, excerpts and transcripts for up to 4 years after grant termination date.

22. Suspension and Termination of Grants

- a) A grant may be suspended or terminated (i.e. before agreed upon end date) in whole or in part by HWF Staff when the grantee has failed to comply with the terms and conditions of the grant and/or contract. A grantee may appeal the HWF Staff decision to suspend or terminate a grant to HFB. The grantee must pay a \$250 fee to cover administration costs for the appeal.

23. Grant and Applications File Tracking

- a) Pre-grant activity
 - i) Individual applications: each application will receive a unique tracking number and have its basic information input into the IT system.
 - ii) Aggregate applications: Staff will track data on applications for internal and external reporting purposes including number of applications received (by time period, geography or other needed categories), number of declined applications and rationale, and time elapsed between application acknowledgment and funding decision.
- b) Grant award tracking system: the Grant Award Tracking system will monitor the timing and requirements for grant payments and reports (e.g. generate/review list of upcoming payments).
- c) Grantee report monitoring: Staff will monitor due dates for upcoming grant reports and review grantee reports.
- d) Record-keeping
 - i) Depending on the size and complexity of the grant, the grant file should contain: application package, final approved budget, docket, grant notification letter and contract, tax status determination letters, amendments/cancellations, grantee reports, closing letter, project evaluation, record of payments/returns, correspondences with grantee, site visit reports, audited financial statements of the grantee, and grantee acknowledgement of payment receipts.
 - ii) Grant award files will be kept by HWF Staff for at least 7 years after completion of the grant.
 - iii) Declined grant applications will be kept by HWF Staff for at least 2 years after the decline date.

24. Use of Consultants

- a) A consultant may be needed to provide assistance in the operations of GF. The annual budget for consultant expenses will be approved by the BOS.

25. Grant Fund Evaluation

- a) The Annual Community Benefits Report, issued to the public, will detail grants made and the overall performance of the GF. Staff will prepare the Report to be reviewed by HFB and the BOS.

26. Changes to Grant Program Policies and Procedures

- a) BOS reserves the right to make policy changes as needed.
- b) Staff will make procedural and typographical changes as needed.

27. Extraordinary Project Criteria

- a) Although ineligible according to Headwaters CIF, Grant Fund, and Revolving Loan Fund criteria, an extraordinary project providing extraordinary economic benefit to Humboldt County may still be eligible for Headwaters Funding. This Extraordinary Project must pass the following levels of approval:
 - i) Staff and HFB recommendation; and
 - ii) BOS super-majority vote approval (i.e. approval by at least four out of the five Board of Supervisors).
- b) Selection criteria:
 - i) The project must demonstrate a total economic benefit that significantly exceeds the economic benefit from using twice the amount of funds for the Revolving Loan Fund, CIF, or Grant Fund; whichever of the three Funds that would be appropriate and/or most impacted would be the standard against which to judge the Extraordinary Project. In other words, if the Extraordinary Project requests \$1 million, its total economic benefit must exceed using \$2 million for Revolving Loan Fund, CIF, or Grant Fund investments;
 - ii) The calculation of total economic benefit should include measures such as County-wide direct and indirect job creation/retention, wealth generation, workforce development, and business development; and
 - iii) No alternative sources of funding should be readily available.
- c) Government jurisdictions and non-profit organizations are eligible to apply.
- d) Businesses, individuals, and political lobbying groups are ineligible to apply for funding.
- e) Under no circumstances can the Extraordinary Project include using Headwaters Fund money for general County government funding.