

Vermont Foodbank Grants Pass-Through Escalation Policy

At Vermont Foodbank, we are committed to a grants pass-through program that reflects our guiding principles for our Network- one that fosters collaborative relationships and open communication with our grantee partners. Ultimately, our grant program is designed to ensure the responsible stewardship of grant resources, and to design a program that effectively meets the needs of our neighbors. To do so, we ask all participating organizations to meet certain expectations, such as attending associated meetings or learning activities and submitting reporting requirements.

Because all grant funds are typically disbursed in full at the start of the grant period, we rely on clear expectations and shared accountability rather than installment-based enforcement. The following policy outlines the steps we will take if a grantee does not meet core grant participation requirements.

Escalation Policy:

1. First Missed Requirement- *Reminder and Re-engagement*

If a grantee organization misses a required meeting or deliverable deadline without prior approval*:

A staff member will reach out via email to:

- Remind the organization of the missed requirement.
- Reiterate upcoming expectations and opportunities to re-engage.
- Outline the expected timeline for a response
(*e.g. we are expecting to receive your response within the next 10 days*).
- Offer support in resolving any potential barriers to participation.
- Attach a copy of this grant pass-through escalation process for transparency.

The staff member will retain documentation of the communication; in case it is necessary for future escalation.

*Prior approval relates to any explicit permission given in advance of a deadline by relevant Vermont Foodbank staff if a grantee anticipates missing a meeting or deadline.

2. Second Missed Requirement- *Formal Notice*

If a grantee organization misses a second requirement without prior approval or has not responded to communication about the previous missed requirement within the stated

timeline:

A formal notice will be sent via email, outlining:

- The unmet expectations to date.
- The opportunity to re-engage and make up missed activities, if feasible.
- The organization will be asked to confirm continued interest in the program and re-commit to future participation. Organizations will have 10 business days to confirm and re-commit to their program.

The staff member will retain documentation of the communication; in case it is necessary for future escalation. The staff member should communicate the issue of formal notice to other relevant Vermont Foodbank staff members who manage other Network Partner grants or programming.

3. Continued Non-Compliance- *Escalation and Documentation*

If issues persist or the grantee fails to respond:

- The organization will be flagged for internal review. This review may lead to exclusion from future grant opportunities.
- A summary of the engagement record will be documented in the grantee's file.
- Leadership at the grantee organization may be contacted to discuss next steps.

4. Final Determination- *Suspension & Corrective Action*

After internal review, if it is determined an organization has failed to comply with critical participation benchmarks despite outreach, Vermont Foodbank reserves the right to:

- Refrain from offering future funding opportunities to the organization for a period determined appropriate by internal review.
- Require additional conditions (e.g., participation benchmarks, check-in calls, increased reporting requirements) in future grant agreements.

Vermont Foodbank will notify organizations via writing of the internal review decision and justification for this decision. Any willful misuse of Vermont Foodbank grant funds may result in immediate escalation to the final stage of the escalation policy, including potential suspension of the organization's eligibility for future grant opportunities.

If a determination leads to corrective action, the review committee should notify the following list of Vermont Foodbank staff members:

- Chief Executive Officer

- Chief Community Impact Officer
- Chief Finance Officer
- Chief Philanthropy Officer
- Senior Manager - Government & Public Affairs
- Director - Branch Operations (for the corresponding warehouse)

Suspension of an organization from grant opportunities or any intentional misuse of funds may initiate or further escalate broader corrective action in relation to Vermont Foodbank's Basic Agreement between VF and a Network Partner. Fraudulent use of funds may count as a serious violation, similar to any other fraudulent use of product, and may result in immediate suspension or termination of Network Partnership without prior notice.

Funding Return:

If at any point during the grant period a partner organization is no longer able or willing to meet the requirements of the grant agreement, they are encouraged to initiate a conversation with Vermont Foodbank to discuss the voluntary return of all or a portion of the grant funds.

A voluntary termination and return of funds demonstrate organizational self-awareness and a proactive commitment to financial stewardship. Such actions will not be documented as a negative action in the grantee's file and will not impact a grantee's eligibility for future funding.

At the close of the funding period, it is the responsibility of the grantee to notify Vermont Foodbank of any unspent or unallocated funds. Grantees may request an extension for the use of funds and/or final reporting. Vermont Foodbank reserves the right to approve or deny extension requests at its discretion.

If a grantee has unallocated funds remaining and is not operating under an approved extension or retains funds beyond an agreed-upon extension deadline, Vermont Foodbank may request the return of those funds. Failure to return requested funds within 30 business days of non-compliance notice may initiate the *Suspension & Corrective Action* process outlined above.

We recognize that organizations, especially those with limited volunteer/staff capacity or serving historically under-resourced communities, may face increased barriers to full engagement. Our intention in our grants pass-through programming and reporting is to be supportive and to help build a case of support for nourishing more of our neighbors. Grantees are encouraged to communicate with us early and openly if challenges arise. Reasonable accommodation and flexibility may be granted on a case-by-case basis.