

# **Grants Manual**

## **College of the Mainland**

**May 2018**



## Table of Contents

INTRODUCTION.....	7
Grants to begin.....	8
Types of Grants.....	8
GRANTS OFFICE.....	10
Grants Office Staff.....	10
GRANT DEVELOPMENT.....	11
Grants Development Flowchart .....	12
Grants Office Pre-Award Responsibilities.....	13
Identifying Funding Sources and Eligibility .....	14
Solicitation .....	14
DEVELOPING THE GRANT PROPOSAL .....	15
Grant Narrative .....	15
Proposal Sections .....	15
Introduction.....	15
Statement of Need.....	15
Approach.....	16
Goals, Objectives, and Activities.....	16
Tips on Writing the Narrative.....	16
Work Plan for Proposal.....	17
Logic Models or Work Plans.....	17
Sample Project Work Plan.....	18
Budget.....	19
Budget Narrative.....	23
Evaluation Plan.....	23
Project Timeline.....	24
Project Sustainability.....	24
Letters of Intent.....	24
Letters of Support of Commitment.....	24
Final Signature for Grant Review and Approval Form.....	24
GENERAL PROVISIONS AND ASSURANCES .....	25
Certification Regarding Debarment, Suspension, Ineligibility, and Voluntary Exclusion.....	25
Lobbying Certification .....	25
SUBMISSION AND NOTIFICATION .....	25
Submission Process.....	25
Review Process .....	26
Award Notification .....	26
GRANT IMPLEMENTATION.....	26
Award Notification and Orientation.....	26
Tips for Successful Grants Management .....	27
College Offices .....	28
Grants Post Award Responsibilities .....	29
Grants Financial Services Responsibilities .....	30
Datatel.....	31
Flowchart for Funded Projects .....	32
GRANT COMPLIANCE.....	33

13 Ways to Ensure Compliance .....	33
Remedies for Non Compliance .....	35
INITIATING A GRANT PROJECT .....	36
Project Director/Coordinator.....	36
State and Federal Grant Management .....	36
Regulations for Federal Awards .....	36
General Provisions.....	39
FINANCIAL and PROJECT MANAGEMENT.....	40
Orientation for New Grantees .....	40
Agenda for an Initial Grant Orientation.....	40
Budget and Finance.....	41
Accounting Procedures.....	41
Setting up the Budget .....	43
Access to the Budget .....	44
Allowable Costs .....	44
Rules and Regulations .....	45
Managing the Budget .....	45
Contingency Budgets .....	46
Travel .....	47
In-District Mileage .....	48
Unallowable Costs .....	49
Cash and In-Kind Matching Funds.....	49
Indirect Costs .....	50
INTERNAL CONTROLS.....	50
Responsibility.....	50
Elements of Internal Control.....	51
Control Environment.....	51
Risk Assessment.....	51
Control Activities.....	52
Information and Communication.....	52
Monitoring.....	52
Components of the Control Activity.....	53
Personnel.....	53
Authorization Procedures.....	53
Segregation of Duties.....	53
Physical Restrictions.....	53
Documentation and Record Retention.....	53
Monitoring Operations.....	53
Internal Control Limitations.....	53
Period of Performance.....	54
FINANCIAL REPORTING .....	55
Budget Reporting .....	55
Time and Effort Reporting .....	56
Time and effort requirements for Staff funded 100% from one grant.....	56
Time and effort requirements for staff split funded in more than 1 grant program.....	56
Approval of Grant Purchases and Expenditures.....	57
GRANT MONITORING AND ACCOUNTABILITY.....	58
PROJECT MANAGEMENT.....	58

HUMAN RESOURCES .....	59
Project Personnel.....	60
HR Staff .....	60
Hiring Grant Personnel .....	60
Interviews .....	62
Employees .....	63
Leave .....	63
Benefits .....	63
Worker's Compensation.....	64
Conflict of Interest and Code of Ethics.....	64
SUB RECIPIENT MONITORING.....	64
Purpose.....	64
Who Must Monitor Compliance.....	65
Responsibilities of Monitoring the Sub award.....	65
ISSUING AND MONITORING FEDERAL SUB AWARDS.....	66
Sub award is Authorized.....	66
Assess Readiness for the Sub award.....	66
Responsible Conduct Research Regulations.....	66
Assign an Overall Risk Level.....	67
Develop a Monitoring Plan that Reflects Risk Level.....	67
Standard Monitoring Plan for Low-Risk Sub recipients.....	67
Financial Monitoring.....	67
Additional Monitoring Steps for Medium and Higher Risk Sub recipients.....	68
Prepare, Issue, and Report on the Sub award.....	68
Conduct Ongoing Monitoring of the Sub award.....	69
Prompt Payment.....	70
Close Out the Sub award.....	70
PURCHASING .....	70
Purchasing Office Staff .....	70
Procurement Records.....	71
Signature Authority.....	72
Methods for Collection, Transmission and Storage of Information.....	72
Types of Property.....	72
Property Classifications.....	73
Prior Written Approval.....	74
Purchasing Process .....	74
Procurement Standards.....	74
Conflict of Interest.....	75
Employee Conflict of Interest.....	75
Gratuities.....	76
Organizational Conflict of Interest.....	76
Duties to Report Conflict of Interest.....	77
Procurement Standards Continued.....	77
Open Competition.....	78
Procurement Requirements.....	78
Procurement without Competition.....	78
Procurements requiring competition or cost price analysis.....	79
Procurement Documentation.....	79

Procurement Methods.....	80
Procurement by Micro-purchase.....	80
Procurement by small purchase procedures.....	80
Procurement by competitive sealed bids.....	80
Procurement by competitive Proposals.....	81
Noncompetitive Proposals.....	81
Sole Sources .....	81
Sole Source Justification Criteria.....	82
Notes on Procurement Methods.....	82
THE CONTRACTING PROCESS.....	83
Suspension and Debarment.....	83
Contract Administration.....	83
Contract Provisions.....	83
INVENTORY.....	83
Equipment Standards.....	83
Inventory Management System.....	83
Disposition of Equipment.....	84
Disposition of Supplies.....	84
Procurement and Affirmative Action.....	84
Small and Minority Businesses, Women Owned Businesses, and Labor Surplus Area firms.....	84
Procurement of Recovered Materials.....	84
Contract Cost and Price.....	85
Procurement Review.....	85
Bonding Requirements.....	86
Contract Provisions.....	86
Procurement Cards (P-Cards) .....	86
P-Card Guidelines Overview.....	87
Bid Process .....	88
CONCLUSION .....	88
APPENDICES.....	A-J

## **COLLEGE OF THE MAINLAND GRANTS OFFICE**

The mission of the Grants Office is to coordinate and assist in the acquisition of public and private funding and to support faculty and staff with grant programs, once funding has been awarded. The Grants Office is committed to the students and staff in the pursuit of funding sources that are congruent with the mission, vision and annual priorities of College of the Mainland (COM).

The Grants Office maintains a centralized one-stop reporting center located at 1501 Amburn Road, Suite #16. The central location strengthens the oversight of grant related policies and processes, improves programmatic oversight of grant projects for compliance and performance, and optimizes grant related systems, college wide.

This manual is the primary reference for writing grant applications and managing grants awards for the College. It provides guidance on being a responsible and effective grantee meeting all federal and state guidelines.

### **INTRODUCTION**

In December 2014, the new Federal Uniform Grant Guidance (UGG) went into effect. College of the Mainland applies these guidelines to all grants, whether federal, state, foundation, or other independent organizations. The grants guidance is 2 CFR part 200. Some pertinent information from the new UGG is below. Other information is cited throughout this grant manual.

- This new UGG is adopted by every federal agency.
  - Applicable to new federal grants after December 26, 2014
  - Applicable to state administered programs on July 1, 2015
  - Applicable to procurement rules July 1, 2018
- The UGG language “should” is a recommendation and “must” is a requirement.
- Organizations must take prompt actions when instances of non-compliance are identified. They must evaluate and monitor compliance.
- Organizations must take reasonable measures to safeguard personally identifiable information and other sensitive information.
- There is no true statute of limitations of documentation on grants. Agencies could be audited 10 years after a grant closes. Some grants, such as Carl Perkins for example, do have established dates for statutes of limitations. It is important to know the records retention requirement for funding agencies.
- Even if an item is in your approved grant budget, it may still not be allowable. It is important to assure that all items are allowable.
- All documentation should be saved in a PDF format (§200.335)

As members of the Federal grants community, there is a continuous effort to adopt the Uniform Grant Guidelines (2CFR 200) but the government wide guidance is a living document with numerous changes that have already been made, for example, 2 CFR 200 changed to incorporate the Federal Awardee Performance and Integrity Information system (FAPIIS) and extend the procurement implementation deadlines. It is important to review Federal Grant Updates regularly.

## **GRANTS. To begin**

Here at College of the Mainland, when faculty or staff locate grant funding for a project, he or she are required to complete a Grant Review and Approval Form (GRAF) (see Appendix A) and submit it to the grants office or specifically to the Grants Development Officer. The Grants Development Officer will provide a summary of the proposed grant program using the Grants Decision matrix. The submitted documentation will be provided for review by the President's Cabinet where the Cabinet will either approve or deny the development of the grant program. Once the GRAF has been approved by President's Cabinet, the Grant's Development Officer will coordinate the development of the grant proposal. If the proposal is funded, the applicant must comply with requirements of the grant as specified by the funding agency. All grant awards provide instructions that outline these requirements. Grants staff should know whether or not they have been awarded a grant or a contract, as the two have different stipulations.

At College of the Mainland, the Grants Development Officer may apply for grants either under the College or from the COM Foundation, depending upon the specific opportunity. Regardless if the grant is awarded through the College or the Foundation, they are responsible for grant management, administration, and reporting. Usually a grant director or coordinator leads the project and works with the Finance and Grants Offices. This manual will help grant directors and coordinators to discharge these responsibilities.

## **Types of Grants**

**Private Foundation:** A nongovernmental, nonprofit organization with funds (usually from a single source, such as an individual, family, or corporation) and program managed by its own trustees or directors. It is established to aid social, educational, religious or other charitable activities, primarily through grant making.

- U.S. private foundations are tax-exempt under Section 501(c)(3) of the Internal Revenue Code.
- Private foundations are generally founded by an individual, a family or a group of individuals, and are organized either as a nonprofit corporation or as a charitable trust.

**Family Foundation:** One whose funds are derived from a member of a single family. At least one member must continue to serve as an officer or board member of the foundation, and is the donor. The family member plays a significant role in governing and/or managing the foundation throughout its life. Most family foundations are run by family members who serve as trustees or directors on a



voluntary basis-receiving no compensation.

**Corporate Foundation:** A private foundation that derives its grant making funds primarily from the contributions of a profit-making business.

**Community Foundation:** A community foundation is composed primarily of permanent funds established by many separate donors for the long-term benefit of the residents of a defined geographic area. Typically, a community foundation serves an area no larger than a state. Community foundations provide services to donors who wish to establish endowed funds without incurring the administrative and legal costs of starting independent foundations.

**Local/Other Grants:** Local and national foundations offer funding opportunities, as do cities and counties. These opportunities are typically narrowly focused on a specific need. Awards are usually smaller than those available from the state or federal government.

**State-Administered Grants:** State agencies announce, award, and supervise all aspects of grant-funded projects.

**Direct Federal Grants:** Federal agencies announce, award, and supervise all aspects of grant-funded projects. Federal opportunities are typically the largest awards available.

**Formula Grants:** Legislation authorizes the awarding of formula grants based on a formula. Eligibility to apply is therefore based on criteria, such as population characteristics. These are generally, not competitive opportunities but are rather awarded to entities meeting the stated criteria. However, application forms are usually still required.

**Other:** Other external funding, such as contracts or gifts to College of the Mainland vary in nature and requirements. In all cases, the Grants Office and Foundation Office should be aware of the funds and will guide the recipient in appropriate procedures.

## GRANTOFFICE

### GRANTS OFFICE

#### Grants Office Staff

College of the Mainland has a Grants Office whose staff are able to assist you during the grant writing, implementation, and management processes. Please contact the Grants Office if you have questions.

Bldg./Office	Name/Position	Phone	Email
Appomattox Building Suite #13	Mary Ann Amelang Vice President for Institutional Advancement	409-933-8674	mamelang@com.edu
Appomattox Building Suite #13	Dr. Susan Weeks Grants Development Officer	409-933-8419	Sweeks1@com.edu
Appomattox Building Suite #16	Cindy Pagan Grants Compliance Officer	409-933-8672	Cpagan2@com.edu

College of the Mainland staff and faculty who are interested in writing a grant should contact the Grants Development Officer with ideas and a listing of possible funding sources. The flowchart below will show the initial steps to writing a grant at College of the Mainland.

It is very important that prior to submitting a grant, complete the GRAF form, and submit it to the Grants Development Officer who will complete a grants decision matrix and forward the information to President's Cabinet. The Cabinet will discuss the project and either approve or deny moving forward with the application. The College President will sign and approve the GRAF therefore demonstrating that the grant fits within the College's mission and that the College has the infrastructure in place to manage the grant.

The Grants Office will:

- Provide pre and post award grant assistance to faculty and staff submitting applications to external funding sources in an effort to adhere to the mission and values of College of the Mainland.
- Meet with faculty and staff to assess needs for grant funding and determine if such funding may be available.
- Work with faculty and staff to obtain funding by providing assistance through the grant application process.
- Assist with maintaining records and reporting requirements necessary to ensure preparedness to the expectation of external audits of the grant project.

- Provide general oversight, compliance and accountability throughout the life of the grant.
- Review for approval and allow ability of all expenditures that are used from grant funds.

## **GRANTS DEVELOPMENT**

### **A Note from the Grants Development Officer:**

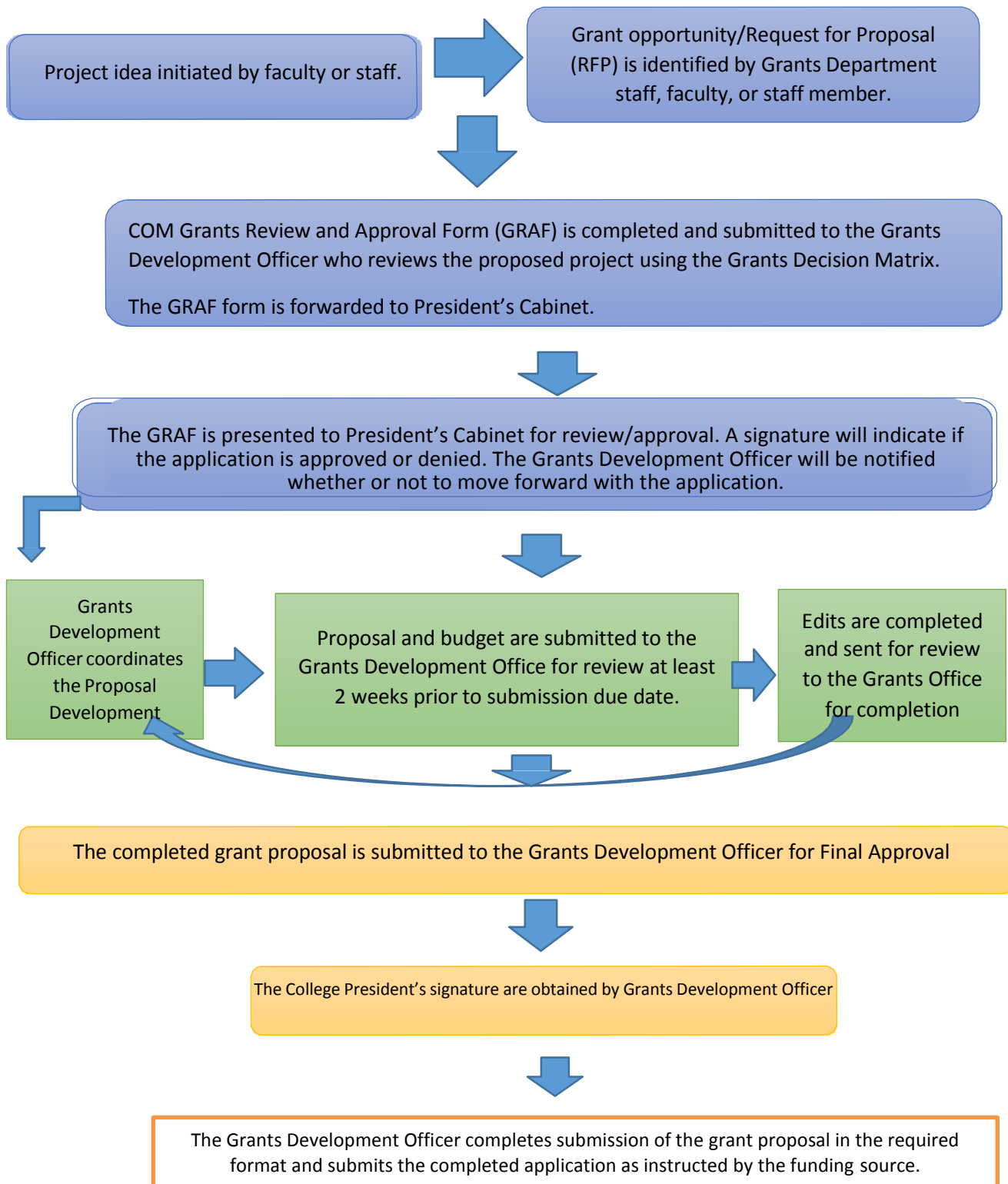
The goal of grant development at College of the Mainland is to increase grant funding that supports the college's mission and strategic plan. To do this, we must be able to keep track of all grant obligations that the college makes to funders, which means knowing what grants are written, when they are written and to whom they are written.

In order to keep college records up to date and to be sure no funder is approached too often for similar projects, the official submission of all grants must go through the Grants Office. There are many excellent grant writers across campus that we rely on for accurate and compelling descriptions of the programs for which they need funding, and there are some programs that need funding who faculty or staff would rather give us information and let us write the application. Regardless, the grant office must handle the official submission, whether mailed, emailed, or filled out in an online electronic application.

If you are writing the application or proposal yourself, you must send the completed application to Susan Weeks at least three full days before the application due date so she is able to secure the required signatures and then submit the grant with all of the necessary attachments. The President is the only person on campus who can legally enter the college into a binding financial contract, so his signature is the only one that funders accept. Even when an online application does not require a physical signature, the grants office always has signature approval before clicking the send button.

Before starting to develop a grant, the Grant Request and Approval Form (GRAF) is required by the President's Cabinet and must be approved before starting the application. Whether or not the grants department is heavily involved with the grant writing, a key responsibility of the grants office is to keep track of all submissions, as a grant impacts departments across campus. We keep a grants spreadsheet and a copy of all grants with signature pages so that the President and Cabinet are aware at all times how much we may reasonably expect from grant funding, what has been funded through grants and which grants have been rejected. We also inform the Controller's office of the financial reporting requirements of the grant as early as possible in the process so they have an idea of the workload that may be added to their department. After the funds are awarded, COM's Grants Compliance Officer, Cindy Pagan, contacts those tasked with implementing the grant to make sure the project follows all federal and state requirements and regulations.

## Grants Development Flowchart



The following grants development list will assist staff in determining the need for and feasibility of writing a grant and will provide guidance on steps to accomplish the task.

### **Grants Office Pre-Award Responsibilities:**

Most of the pre-award responsibilities are that of the Grants Development Officer who will:

- Identify the College annual priorities that the identified opportunity will fit.
- Be familiar with the Request for Proposal (RFP) guidelines.
- Obtain the College President's signature on the GRAF form giving permission to write the grant application.
- Identify the funding source.
- Identify College resources needed, including matching funds or in-kind resources.
- Assist with the development of the grant budget.
- Proof all grants and secure final approval and signatures before they are submitted.
- Facilitate meetings and discussions on proposal content within the program guidelines.
- Provide information concerning the College and community and assistance in developing statistical data to support the grant proposals idea.
- Identify the problem that the project addresses, to ensure a clear and convincing explain the need of the project.
- Review early drafts of the grant to include the proposed budget.
- Coordinate the final packaging of the grant for submission.

Successful grant seeking begins with an idea for a project that the writer is committed to and that aligns with the College mission. These questions will help you generate and think through the idea.

- What is the goals for this project? What will be the end results of the project idea?
- Who will benefit from the proposal project? What College population will you serve?
- What are the anticipated outcomes of the project? Outcomes should be measureable and lead to the accomplishments of the projects objectives.
- How does the project fit the missions of the College, and if applicable, the program? Why should this project be a priority?
- What makes this project special or different from other efforts targeting the problem?
- How does this project build on previous efforts with demonstrated success?
- What are the costs associated with the activities and resources involved in this project?
- What is the timeline of proposed activities?
- What College resources, facilities, or services will the project require?
- Who are the partners needed to implement this project? What will be their roles and contributions? Are they within the College or external?

- How will the effectiveness of the project be evaluated?
- Is there commitment to the project from the supervisor/administrative staff?
- What will be the lasting results of this project?
- What recurring costs will need to be covered by another funding source?
- Does your plan for grant funds include strategies to continue to project after funding ceases?

## **Identifying Funding Sources and Eligibility**

Once the idea has been developed with clear goals and objectives, the faculty and staff, with direction from the Grants Development Officer, are encouraged to research potential funding opportunities to find the right match for the project. All possible funding sources and documentation should be reviewed by the Grants Development Officer to ensure that the project closely aligns with the funding agency's goals and objectives.

## **Solicitation**

Different funding agencies use different terms to announce their grant opportunities, such as the following:

- Request for Application (RFA)
- Request for Information Proposal (RFIP)
- Request for Proposal (RFP)
- Request for Quotation (RFQ)
- Solicitation for Grant Application (SGA)

No matter what term is used, the announcement will include the instructions for the application along with requirements by the funding agency. Those requirements will include:

- Deadline for the application
- Amount of funds for which the grant writer may apply
- The proposed start and ending date
- The grant's focus
- Application format, possibly including font, margin, spacing and other requirements.
- Any restrictions on the geographic area that is eligible for funding
- A statement regarding higher education institution's eligibility.

In addition to the requirements listed, the new Federal Uniform Grant Guidance contains provisions that require federal agencies to conduct a review of the merits, financial risks, and performance goals and assessments of all applications before making the award.

Grant writers should be aware of new regulations in the Uniform Grant Guidance, including the following:

- Section 200.205 of the Uniform Grant Guidance (UGG) requires that federal awarding agencies conduct a financial risk assessment of recipients before making an award.
- The UGG also has required identifying data elements for each non-federal entity (grantee or sub grantee). These are listed in section of the 200.210 of the UGG. (see attached link for new federal guidelines which went into effect December 2014: [UGG Federal Guidelines December 2014](#))
- Grants that require matching or in-kind contributions shall be evaluated for overall impact on current and future College funds.

## **DEVELOPING THE GRANT PROPOSAL**

**After President’s Cabinet approval to develop the project and permission to write the grant, then begin working on the grant application which will be coordinated by the Grant Development Officer. There are various sections of the proposal to be completed, carefully follow the instructions provided by the proposal solicitation which some parts that may be included are:**

**\*\*\*NOTE: KNOW YOUR SUBMISSION DEADLINE:** Plan to submit your proposal on or preferably before the deadline; Be realistic about whether you have time to prepare a competitive proposal that meets the deadline. Know the funder’s policies on late submissions, exceptions, and mail delays. Find out how the funder will notify you about the receipt and status of your proposal. Factor this information into your timeline.

### **Grant Narrative**

The Grant Development Officer will coordinate the development of a grant narrative based on the requirements of the RFP. Typical sections of a grant narrative are an introduction; statement of need; and project goals, objectives, and activities. A project plan is included to provide a plan for sustaining the program when grant funds are no longer available. If collaborators are required, letters of commitment are often included in the grant requirements. Description and examples are found below:

### **Proposal Sections**

**Introduction.** Typically, the introduction describes the organization, its mission, its demographics, programs, and services. Census and workforce development data is usually included. All of this information provides the basis for the rationale of the proposal; why it’s important, what problem it will solve, who it will help, and why the funder should care. Some opportunities require an abstract outlining the project. The abstract should include an overview of the project, including the goals, timeline, and cost. Writers explain how the project fits within the institution’s mission.

**Statement of Need.** Grant proposals must demonstrate a compelling need for the project. In

order to do so, a writer must have a clear understanding of the knowledge and literature within the field. References to other programs and studies addressing the same or similar problems will demonstrate the writer's expertise and ability to implement what has already been learned. Both quantitative and qualitative data should be utilized when establishing need.

**Approach:** Method and process of accomplishing goals and objectives, description of intended scope of work with expected outcomes, outline of activities, description of personnel functions with names of key staff and consultants, if possible.

**Goals, Objectives, and Activities.** All projects must have goals, objectives, and activities that align with each other and the overall purpose of the project.

**Goals.** Goals must align with the goals of the funding opportunity. They should provide the overall purpose and support the mission of the project. Goals are broad statements that are not necessarily measurable; instead they show a direction and the overall outcome expected.

**Objectives.** Objectives are narrower than goals and can and will be measured. Specific and concrete, they explain how the program's success or failure will be assessed. If the objectives measure a process, such as an implementation, they should include the events involved in the implementation; if they measure outcomes, such as student learning outcomes, they will measure successes or levels of performance.

**Activities.** Activities are tied to objectives and goals and to budgets; activities provide the action plan for implementing the project. They may include timelines, project management details, and strategies. Activities are necessary to the success of the project and should be fully described in the proposal. The description of activities should focus on what methods will help the project meet its goals and objectives. If the activity is not necessary for reaching the project's objectives, leave it out.

- Activities should correspond to the goals, objectives, and budget
- Activities are the methodology or plan of action for the project
- Activities typically include strategies, timelines, management plan and responsibilities
- Be careful about over committing in this section

### **Tips on Writing the Narrative**

Narratives usually answer the following questions:

- What do we want?
- What concern will be addressed and why?
- Who will benefit and how?
- What specific objectives can be accomplished and how?
- How will results be measured?
- How does this funding request related to the funders purpose, objectives, and priorities?



- Who are we (organization) and how do we quality to meet this need?

The following examples include a project goals, objectives, and associated activities:

**Example 1:**

*Goal:*

Students will demonstrate improvements in student learning outcomes through innovative, modularized instructional delivery.

*Objective:*

Students will successfully complete, with a grade C or higher, a modularized program in mathematics that includes a customized learning environment based on background, skill level, learning preference and academic/professional goals.

*Activity:*

At least 60 students will utilize integrated modules, MyLab software, videos, and Live Scribe podcasts.

***Work plan for proposal:*** Draft a timeline for the work on a proposal; be sure to include time for submitting it to the Grants Development Officer, Grants Accountant, and others. Note that the proposal and budget must be submitted at least 10 working days prior to the submission date for proofing and budget validation.

***Logic models or work plans:*** Logic models, or work plans, show the alignment among various elements of the proposal, as illustrated in the Health Resources and Services Administration (HRSA) sample below:

**Example:**

**SAMPLE PROJECT WORK PLAN**

<b>DEPARTMENT OF HEALTH AND HUMAN SERVICES</b> <b>Health Resources and Service Administration</b>				<b>FOR HRSA USE ONLY</b>	
				<b>Application Tracking Number</b>	
<b>Section A – Comprehensive Needs Assessment</b>					
<b>Goal A1: Identifying major health issues for the population in be served, unmet need, barriers to care, etc.</b>					
<b>Objectives</b>	<b>Key Action Steps</b>	<b>Expected Outcomes</b>	<b>Data Evaluation and Measurements</b>	<b>Person/Area Responsibilities</b>	<b>Comments</b>
A1.1. Develop protocol and measures for implementing needs assessment within two months of grant award A1.2. Establish a team of knowledgeable planning staff to oversee undertaking of needs assessment within one month of grant award. A1.3. Complete needs assessment for targeted services area within 4 months of award. A2.3. Secure consultant to assist with needs assessment.	1. Identify appropriate tools for use for the needs assessment. 2. Establish Subcommittee of the planning staff to oversee needs assessment. 3. Define roles of planning staff and for the project.	1. Participate in the comprehensive needs assessment elements meeting with area stakeholders. 2. Create tangible targeted assessment protocols and tolls for identified populations in collaboration with other health centers. 3. Conduct at least one coordinating meeting every month. 4. Completed needs assessment.	1. The number of planning meetings. 2. Determination made regarding approach 3. The number of meetings attended. 4. Number of persona at each meeting. 5. Progress against established timeline for completion of assessment.	1. Planning Grant Committee 2. CEO 3. Board of Directors 4. Consultant	
<b>Goal A2: Applying for MUA/MUA Designation</b>					
<b>Objectives</b>	<b>Key Actions</b>	<b>Expected Outcomes</b>	<b>Data Evaluation and Measurements</b>	<b>Person/Area Responsibilities</b>	<b>Comment</b>
A2.1. Obtain MUA/MUP designation for census tracts within target service area without a designation by (DATE). A2.2. Identify areas with current MUA/MUP designation s in targeted service area by (DATE) A2.3. Secure consultant to assist with designations.	1. Identify tracts that qualify for MUA/MUP in targeted areas. 2. Apply for MUA/MUP designation and secure list of census tracts that already have MUA/MUP designation in targeted service area.	1. Implemented MUA/MUP designation for undesignated census tracts in service area. 2. Census tracts within targeted service area have MUA/MUP designations.	1. Number of successfully identified census tracts with or without MUA/MUP designation for targeted service area. 2. Number of census tracts that successfully received MUA/MUP designation.	1. Needs assessment subcommittee of planning grant staff. 2. CEO 3. Consultants	

Section B – Service Delivery					
Goal B1: Developing and appropriate service delivery model based on the comprehensive needs assessment					
Objectives	Key Actions	Expected Outcomes	Data Evaluation and Measurement	Person/Area Responsible	Comments
B1.1. Develop a service delivery model that is appropriate relative to the results of the comprehensive needs assessment by (date). B1.2. Identify medical staffing needs by (date)	1. Assess current capacity and willingness of local health care providers to provide services and possible collaborations. 2. Based upon needs assessment, working projections, current inventory of providers and experience, identify optimal clinical and support staff.	1. Written documentation of current community model, capacity, and resources potentially available to the target population. 2. Identified essential clinical and support staff.	1. Finalized document describing evaluation of service delivery models submitted to the Board of Directors. 2. A model and guide for developing specific recruitment and retention activities for the satellite.	1. CEO 2. CMO 3. Human Resources 4. Consultant	
Goal B2: If specified populations (e.g. migrant/seasonal agricultural workers (MSFW) , residents of public housing, homeless persons, low-income school children) are included in the target population, specifying activities related to the identification of the unique access problem and health care needs of these populations.					
Objectives	Key Actions	Expected Outcomes	Data Evaluation and Measurement	Person/Area Responsible	Comments
B2.1. Recruit staff that specialize in providing health services for MSFW populations by (date)	1. Identify specific focus areas for recruiting staff to work with MSFW population.	1. Recruitment of staff with expertise in serving the MSFW population.	1. Recruitment of staff persons with expertise in serving MSFW population.	1. CEO 2. CMO 3. CFO	
Goal B3: Facility planning and location selection					
Objectives	Key Actions	Expected Outcomes	Data Evaluation and Measurement	Person/Area Responsible	Comments
B3.3. Identify potential sites that will meet the health care needs of the target population by (date).	1. Based upon the needs assessment and the current inventory of providers identify the optimal location, faculty, configuration and related square footage, exam rooms, etc.	1. Identify ideal locations (based upon travel patterns and population concentrations, etc.)	1. Number of locations identified for possible location of health center.	1. CEO 2. CMO 3. CFO	

**Budget.** The dollar amounts in the budget will be tied to all staff and activities in the proposal. The Budget are cost projections. They are also a window into how projects will be implemented and managed. A well-planned budget will reflect carefully thought out projects.

- Check all salary and benefits with Human Resources to make sure accurate figures are in the budget.
- Check equipment purchases with IT or other departments and include all necessary costs to get equipment up and running if grant is awarded.
- Contact vendors to get quotes for proposed equipment and supplies. Information Technology should get quotes for computer equipment, printers, iPads, etc. so that accurate figures will be included in the budget.
- Determine in-kind or match, if required, and what College resources will be used.

- Figure indirect costs into the budget if allowed in the grant application.

Grant expenses may not supplant (replace) funds for activities or staff already ongoing or in place at the institution. Furthermore, to meet Federal Uniform Grant Guidelines requirements, grant costs must be allowable and clearly necessary to implement the project.

When developing a grant budget unless otherwise specified, always round to the nearest dollar.

Grant budgets typically include:

- Personnel salaries and benefits
- Travel
- Equipment
- Materials and supplies
- Contractual services
- Marketing and printing
- Participant support costs, scholarships, and tuition
- Indirect, costs, as permitted in the grant
- Cost sharing and matching funds
- Sub-recipients
- Budget narrative

*Personnel Salaries and Benefits.* This section of the budget includes salaries and benefit costs for all staff working on the project. **Remember that duties currently performed may not be covered by grant funds; this practice is call “supplanting” and is strictly prohibited.** Some staff, such as senior administrators, may have portions of their existing salary covered by the grant if oversight of the project represents and additional duty. Faculty are often compensated at the overload rate for courses. However, some funding agencies, may require that faculty time devoted to the project is in the faculty member’s basic load.

Depending on the length of the project, annual projected salary increases and increases in costs of benefits may need to be included. Human Resources will assist you with these costs.

**Example 2:**

Project Administrator- This person will be someone with the background, communication, leadership, and organization skills needed for this project.

July 1, 2015 – June 30, 2016                      \$61,000

*Fringe Benefits-* To include Social Security, Medicare, Retirement, Insurances

July 1, 2015 – June 30, 2016                      \$16,470

*Stipends* – Some grants allow stipends for certain kinds of participation, including student participation, visiting speakers, etc. Some allow funds to be used to purchase student materials.

Example – Teachers who attend Saturday professional development training will receive a stipend of \$100 per day. 25 teacher's x \$100 X 4 Saturdays = \$10,000.

Travel. Travel costs for various projects. For example, travel to conferences and project meetings, is often an allowable cost.

**Example 3:**

In District Travel for project staff and district staff for meetings and training

40 miles @ .54 per mile=\$21.60

Out of District Travel for the project administrator and staff to travel to planning/preparation meetings

Overnight travel 1016 miles @ .54 per miles + \$548.64

5 nights @ \$100 per diem = \$500

Out of State Travel

For Program Administrator to attend federal grant training in Washington DC

5 days @ \$200 per night plus per diem @ \$100 per day and miscellaneous expenses. \$2,500

Equipment. For federal grant programs (and many non-federal programs), equipment is defined as an item of nonexpendable, tangible property that has a useful life of more than one year and an acquisition cost that is equal to or greater than \$5,000. All equipment costing \$5,000 or more should be itemized in the budget. (UGG 200.33)

Example: Videoconferencing Software for 2 classrooms \$10,000 x 2 = \$20,000.

**NOTE:** The College has a policy for its bidding process requirements. Any equipment over \$5,000 per unit is subject to the College's process regarding three quotes.

Materials and Supplies. Check to see how the funder defines "materials and supplies." Usually, this category will involve further specification, such as "office supplies," "training materials," etc. Be sure to include all supplies and materials necessary for each activity, including the evaluation of the project.

Education Materials and Supplies = textbooks, training materials for project = \$3,000

Office Materials and Supplies – to include office supplies for project management – binders, flash drives, office supplies, workshop materials, cables, etc. = \$5,000

Contractual Services. If grant funds will be used to pay a third party, individual or organization, these costs should be included in the Consultants/Contractual category. College of the Mainland uses a Professional Services contract for an external evaluator. It may be that the services are put out for bid, contact Purchasing for further guidance.

Marketing and Printing. This is the category for funds for mailing, printing, copying, advertising, etc. Marketing can provide quotes or the Grants Office can provide typical expenses for the average project of equal scope.

Example: Printing, copying, marketing materials for the project. - \$3,000

Participant Support Costs, Scholarships, and Tuition. Some grant allow tuition for students enrolling in relevant programs. Some funders may require a percentage of the awarded funds be used for this purpose; others may prohibit this use of funds.

Indirect Costs. College of the Mainland has an established Federal Indirect Cost rate of 30.00% for all on campus grants. College policy requires that grant proposals charge the indirect costs of facilities and administrative expenses. “Facilities” may include depreciation, rental of space, and equipment purchases. “Administration” covers the general expenses of running a grant project. These indirect costs must be calculated for all grants at the federally-negotiated rate for College of the Mainland. If the funder does not allow that rate and/or specifies a rate, the Grants Office will assist the grant writer in charging an appropriate indirect cost or it won’t be included in the proposal.

Cost Sharing and Matching Funds. Some grant opportunities require that the College share in project costs and thus demonstrate its commitment to the program. Some grants will require contributions from other grant partners.

In some cases, a cash match is required. Often, cost sharing is a requirement, and at College of the Mainland this frequently includes staff support, where a reasonable amount of someone’s time in addition to his/her regular duties are performed on this grant. For proposals submitted to federal agencies, these College contributions must be verifiable (this includes time and effort logs for staff time) and must NOT be funded by any other federal program or grant. The Grants Development Officer will assure that the necessary approval has been given from College supervisors for the use of staff time and other College resources.

Sub-recipients (UGG §200.330 and §200.331). Some grant projects involve businesses, other Colleges, or organizations in the application, with College of the Mainland serving as lead or fiscal agent. However, not all collaborators are the same. Sub-recipients are partners who may apply for funds with the lead agency, but may only provide specific services or activities for the grant. They are not responsible for all parts of the grant but work as contractors for a needed service. Each grant opportunity’s documentation will provide guidance on the difference between a partner and a sub-recipient. Agreements with sub-recipients will be formalized during the grant writing process in letters of collaboration or memorandums of understanding, as required by the funder. It’s important to remember that for federal opportunities, the same budget, performance, and reporting expectations apply to sub-recipients as to College grant recipients. Grant Administrators must make these expectations clear to potential sub-recipients in the writing and set-up phases of any grant project. Sub-recipient’s arrangements must be clear in the proposed grant budget, and their indirect cost rate must be applied as part

of their budget proposals. State proposals may differ; the guidelines for each opportunity will provide guidance. The Grants Office should be consulted in all situations involving potential sub-recipients.

New UGG requirements for sub-recipients are in §200.331. They include:

- A formal agreement with all sub-recipients
- A pre-award risk assessment must be conducted on the sub-recipient. This should include the sub-recipient's prior experience with similar award, results of previous audits, financial stability of the institution, whether the sub-recipient has new personnel or new or substantially changed systems and the extent and results of federal awarding agency monitoring.
- Specific sub award conditions
- Activities monitoring of sub-recipients to ensure compliance.
- Use of monitoring tools to protect federal funds.
- Verification sub-recipient compliance with the Single Audit Act.
- Evaluation of record

**Budget Narrative.** Grant application packages must include a budget narrative. Funding agencies will also ask for a written description of the budget, called a budget justification. This narrative explains any potential confusion regarding budget expenses, establishes that costs are reasonable, and explains how costs were established. The three elements common to all budget narratives are as follows:

1. The budget items (personnel, travel, equipment, etc.)
2. The written calculations and any justification
3. The line item amount

**Evaluation Plan.** While private foundations may not require an evaluation, all state and federal funding agencies mandate that grant administrators establish and report how well the project worked so that funders know if the project should be replicated elsewhere. The expectations for the rigor and quality of evaluation plans are increasing among federal agencies. Some require very technical measurements of results.

Evaluation plans should include:

- What types of data (quantitative, qualitative, and self-reported) will be collected?
- When will various type of data be collected? If you are collecting formative data throughout the project, will the project activities or timeline change based on that information?
- What methods and instruments will be used for data collection?
- Are you developing your own instruments or using other researchers' assessment tools?

- How will the data be analyzed and who will work on the analysis?
- If the data includes protected information, how will you ensure its security and privacy?
- When will reports of the results and outcomes be available?
- How will you disseminate the information to the research community?

Some funding agencies will require using an external evaluator. Sometimes an RFP will require that an external evaluator be named in the grant proposal along with his or her qualifications. Contact the Grants Office if you need assistance regarding the use of an external evaluation of a project.

**Project Timeline.** Timelines are typically a list of activities and deliverables and will usually include the person listed as being responsible for each listed task. Depending on the grant instructions, timelines may include benchmarks, milestones, the project flow, start and end dates. All timelines should provide the information regarding each deliverable and projected outcomes (see sample Project Timelines in Appendix C).

**Credentials:** information about the applicant that certifies the ability to successfully undertake the proposed effort, such as resumes.

**Project Sustainability.** If required by the grant, determine how the project will be sustained after grant funds end. Articulate this strategy in the grant narrative.

**Letters of Intent.** Some agencies require a letter of intent outlining your project be submitted and reviewed and an invitation to submit a proposal be issued by the funder **before** you write the grant. The project announcement will tell you if a letter of intent is required.

**Letters of Support or Commitment.** Ensure that any needed letters of commitment can be obtained in the available timeframe.

Letters of support from the organizations that are partnering in the project are often required by funding agencies. Sometimes letters from the lead applicant's senior administration are also included. These letters generally include a statement of support for the project and its plan and a brief outline of what contributions the institution or organization will make to the project. The letters should not be exactly the same but should reflect each partner's goals, alignment with their missions, and roles in the project.

**Final Signature obtained on Grants Review and Approval Form (GRAF).** The President of the College is the final approval for all grant applications. Signatures from the College President must be obtained before a grant application can be submitted. The Grants Development Officer will obtain the President's final signature prior to submittal.



## **GENERAL PROVISIONS AND ASSURANCES**

General Provisions and Assurances apply to many grant programs.

### **Certification Regarding Debarment, Suspension, Ineligibility, and Voluntary Exclusion**

The College will not award a contract to a vendor which is debarred or suspended or is otherwise excluded from or ineligible for participation in federal grant award programs.

The Purchasing Department shall verify the eligibility of each vendor with a certification requirement by requesting that the vendor execute a Certification Form before awarding a contract and/or issuing a purchase order. A copy of the Certification Form shall be maintained with the contract and/or purchase order for audit purposes.

The Purchasing Department shall monitor ongoing contracts to verify the contractor's compliance with the debarment, suspension, ineligibility and voluntary exclusion provisions. In the event that a vendor is suspended or debarred during a contract, the College shall contract in force until the contract lapses. The contract term shall not include any extensions to the original term of the contract.

### **Lobbying Certification**

For all federal grants in excess of \$100,000, the College shall certify on the grant application that no federal funds are expended for the purpose of lobbying.

## **SUBMISSION AND NOTIFICATION**

### **Submission Process**

Proposal application packages are to be submitted by the Grants Development Officer depending on the grant mechanism, two weeks prior to the application deadline. However, no College of the Mainland grant application can be submitted to a potential funding agency, unless a Grant Review and Approval Form has been submitted and approved by Presidents Cabinet. The Grants Development Officer will assure that the required signatures are completed before the grant is submitted. The submission method will be specified in the guidelines from the grant opportunity.

For Federal grants, the application submission is via Grants.gov, which requires specific information from College of the Mainland. This is completed by the Grants Development Officer:

- After the Grants Development Officer reviews the application, it will be submitted as instructed by the funder.
- If the application is submitted via Grants.gov site, the RFP can be downloaded. This allow access to the required 424 forms and required budget forms
- The required DUNS number for College of the Mainland.

- Complete all required forms and upload all required documents. The project narrative will be uploaded as an attachment.

### **Submission checklist**

- The proposal must be neat, complete and submitted on time. Be sure to check for the requested number of copies to be submitted and original authorized signatures.
- Address the proposal as directed in the guidelines.
- Be sure to include the required documentation.

### **Review Process**

Typically, federal and state applications are scored using a matrix or rubric, with points assigned to each section of the proposal. The points division can be found within the grant application instructions.

Grant readers are selected based on their experience and/or credentials. Panels of reader's review applications in a panel. The resulting scores are public and may be requested. Usually, comments on these reviews are helpful in formulating future ideas and submitting other grants. Frequently, a project may not be funded upon its initial submission, but subsequent years' revisions to the proposal based on reviewer comments may be successful.

Applications to private foundations are reviewed more informally, and these foundations are not obliged to release their scoring or selection process.

**Note:** Whenever possible, obtain reviewer comments; these will help with future proposals.

### **Award Notification**

Notification from funders about the success or failure of grant applications are most often sent to the Office of the President. Some funders use electronic submission systems that will also provide notification of the application's success to the user. For federal grants, the notification comes in the form of a Notice of Grant Award (NOGA). This form will include the significant information such as contract number, budget period, grant period, project name, and program officer.

## **GRANT IMPLEMENTATION**

### **AWARD NOTIFICATION AND ORIENTATION**

When a grant award is accepted, the College accepts the responsibility for the management and administration of the programmatic, financial, and reporting aspects of the grant project. These responsibilities may include the hiring of personnel, purchasing supplies, utilizing services, procuring equipment, and planning authorized travel and/or training. Not beginning a funded project in a timely manner may increase the risk of failing to complete the grant

objectives. This may also result in unused grant funds. More importantly, the intended beneficiaries of the grant program, services, or activities may not receive all or some of the intended benefits of the program. For these reason, the Grants Office will assist in reducing delays, improve start-up time, and complete project tasks before the end of the project.

The critical information provided by an award notification includes:

- Start and end dates
- Amount of award
- Terms and conditions of services

No funds can be expended on a project until an award letter has been received.

### **Tips for Successful Grants Management**

- Once the Notice of Grant Award is received, immediately submit this information to the Grants Compliance Officer. Include a copy of the approved grant, award letter and contract.
- Review all key documents of the grant. This includes the proposal, program guidelines, RFP (Request for Proposal), award notification, budget, authorizing legislation, and any related information.
- The Grants Compliance Officer will schedule a time for an initial orientation/grant meeting once the award notification is received. The orientation will acquaint program staff with College procedures for invoicing for payment and for project performance reporting.
- Review and understand the goals, objectives, activities, and any deliverables that are required in the grant. It is important that there is a clear understanding the funding agency's expectations to ensure that grant outcomes will be achieved.
- Initial meetings should be held with supervisors and project staff for the grant. Each project staff roles should be reviewed according to the grant project. All project goals and activities should be defined. The grant budget will also be reviewed.
- The Grants Compliance Officer will conduct monthly meetings with grant project staff. At this meeting, accomplishments will be discussed as well as action items to continue to meet the goals of the project. These meetings will provide interaction among project staff and managers to ensure everyone has the most current information especially regarding College of the Mainland policies and procedures and Federal and state requirements.
- The College of the Mainland Grant's Accountant should be provided with a copy of the

grant award letter and approved budget. The accountant will then set up a project fund and input the budget into the proper account codes. For budget access, the Datatel User Request Form CF (Finance) is to be completed and delivered to the Business Office to the Comptroller's attention.

- Communicate with the Grants Compliance Officer the methods for how data is being collected and recorded for the grant project.
- Contact Financial Services to request Datatel Budget access (see Appendix D) and training as well as Travel and Expense training after Datatel access has been approved.
- Grant funded personnel should be hired immediately as to expend grant funds as required.
- Begin making grant purchases as soon as possible once the budget has been approved. Spending should not be done at the end of the grant, but during the implementation period of the grant. The Grant's Accountant will provide you with a grant budget codes. The detailed budget can be accessed through Datatel.
- The project roles and job descriptions are described in the grant. Before the grant application is submitted, there should be an understanding of which positions will need to be built into the College budget after the project ends. All new hires must go through the College of the Mainland Human Resources for hiring new employees.
- Keep documentation of all project activities, including expenses charged to the grant, time and effort, travel, equipment location, and in-kind or match. Funders will want project details at the end of grant and/or during implementation.
- Place key report dates and project deadlines on your calendar. It is the grant manager's responsibility to ensure that all reports are submitted on time. Send copies of any reports to the Grants Compliance Officer for filing.

### **College Offices**

The College of the Mainland has many designated personnel who may be involved in the process throughout the life of a grant. Listed below are the key players in this process:

### ***Grants Office Staff***

<b>Bldg./Office</b>	<b>Name/ Position</b>	<b>Phone</b>	<b>Email</b>
Appomattox Building Suite #13	Mary Ann Amelang, Vice President of Institutional Advancement	409-933-8674	mamelang@com.edu
Appomattox Building Suite #13	Dr. Susan Weeks, Grants Development Officer	409-933-8419	Sweeks1@com.edu
Appomattox Building Suite #16	Cindy Pagan, Grants Compliance Officer	409-933-8672	Cpagan2@com.edu

### ***Financial Services***

<b>Bldg./Office</b>	<b>Name/Position</b>	<b>Phone</b>	<b>Email</b>
ADM -117	Dr. Clen Burton, Vice President for Fiscal Affairs	409-933-8261	<a href="mailto:clenburton@com.edu">clenburton@com.edu</a>
ADM-131	Trudy Trochesset, Controller	409-933-8464	<a href="mailto:ttrochesset@com.edu">ttrochesset@com.edu</a>
ADM-133	Kathryn Holly, Grant Accountant	409-933-8482	kholly@com.edu

### ***Purchasing Department***

<b>Bldg./Office</b>	<b>Name/Position</b>	<b>Phone</b>	<b>Email</b>
MNT-116	Sonja Blinka, Director of Purchasing	409-933-8474	<a href="mailto:sblinka@com.edu">sblinka@com.edu</a>
MNT-117	Jerri Glenn, Buyer	409-933-8473	<a href="mailto:jglenn1@com.edu">jglenn1@com.edu</a>

### **Grants Office Post-Award Responsibilities**

Most of the Grants Office post award responsibilities are that of the Grants Compliance Officer who will:

- Review the grant for general compliance and oversight.
- Schedule and chair grant meetings with all grant project staff.
- Conduct orientation meeting with new grant personnel to discuss specific requirements for managing the grant.
- Monitoring the budget for proper use of funds. Ensures compliance with agency

requirements regarding purchasing regulations, equipment inventory, and closing documents.

- Process award documents, drafts sub-agreements, MOU's, and similar documents.
- Works directly with the business office to coordinate reporting, audit responses, and other grant-related activities.
- Provides direct assistance in the formulation and implementation of College policies and procedures as they affect the administration of grant projects.
- Assists with analyzing, interpreting, and applying Federal, State, Local government, and private funders statutes, rules, and regulations regarding grant administration and implements related College-wide processes.
- Serve as a resource for staff and project manager's during the project development process focusing on allowable expenditures and the project budget.
- Conducts monthly monitoring meetings to review fiscal and performance activities and provides information to project managers to adjust spending.
- Develops trainings and provides oversight to facilitate the preparation of reports and documentation required by grantors.
- House all copies of financial and programmatic reporting for each grant at the College.

## **Grants Financial Services Responsibilities**

Many of the grants financial responsibilities are that of the Grants Accountant:

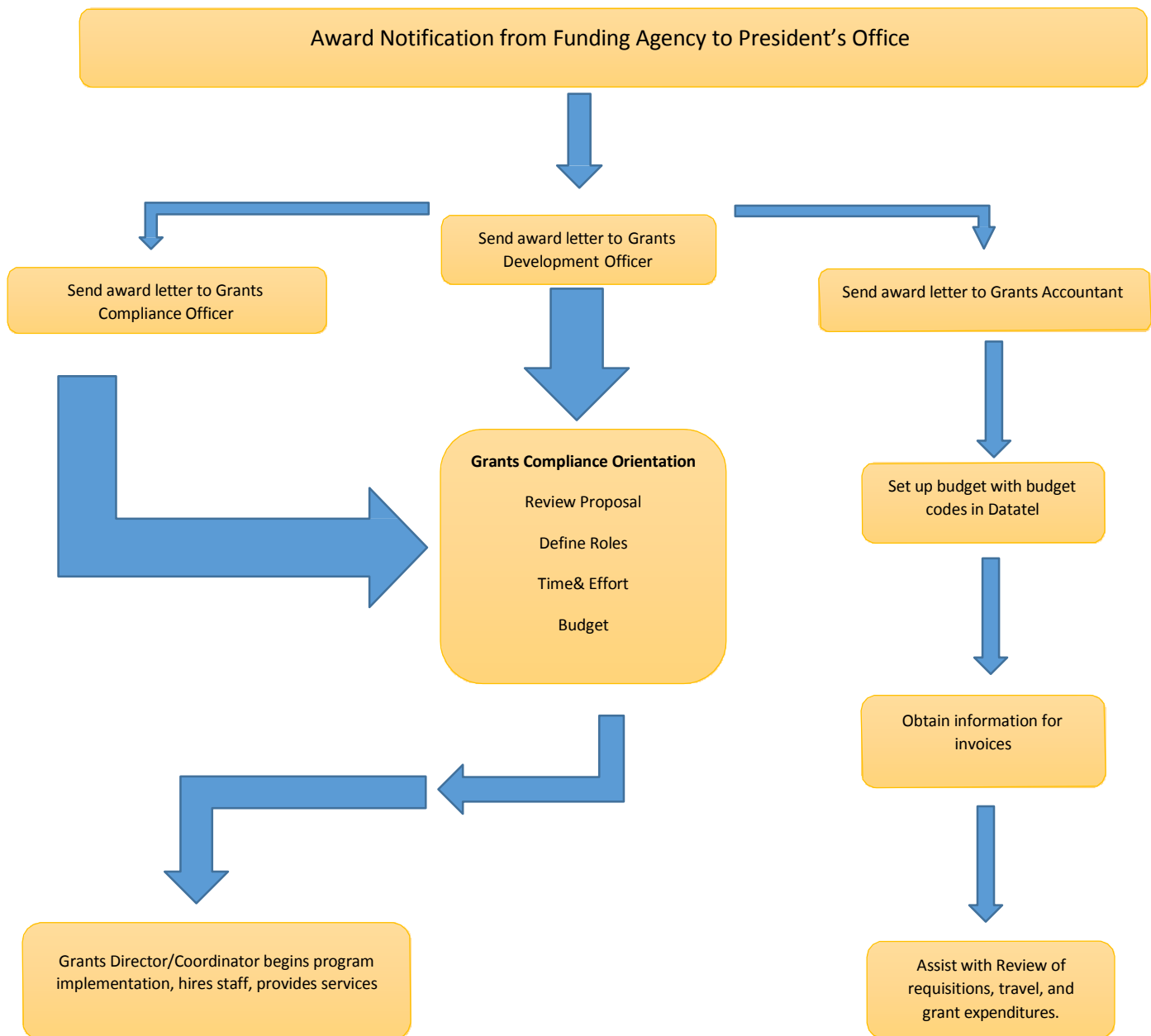
- Post-award financial reporting and financial record maintenance; preparation of monthly, quarterly, and annual fiscal reports. Cash management of all grants including preparation of reimbursement requests and draw-down of funds.
- Assists in annual audit and annual budget development for grants.
- Assists with ensuring that grant funds are expended in compliance with grantor agency regulations. Interacts with outside agencies, internal and independent auditors and financial monitors; serves as Business Office contact for the Grants Manager.
- Implements financial policies and procedures for grants to ensure compliance with funding agency guidelines with the assistance of the Grants Compliance Officer.
- Monitors applicable federal regulations for regulatory changes and updates to grants, and contracts with the assistance of the Grants Compliance Officer.
- Prepares internal and external reports.
- Set up grant funds and enter approved budget per award notification. The Grants Accountant must receive a copy of the award letter, grant proposal, and approved budget before this can be done.
- Provides cash management, including preparation of reimbursement requests and draw down of funds.
- Monitors time and effort reporting.
- Provide final review of grant expenditures to verify account coding is correct.
- Review all requisitions, travel authorizations, and expense reports.
- Obtain certification signature from the College's authorities before expenditure reports

and payment requests are sent to the granting agency.

**Datatel:** Datatel is the College's enterprise resource product (ERP), providing College-wide administrative and instructional support. The sections used frequently are finance, purchasing, personnel, and payroll. These sections give online access to the grant budget, allowing you to see the grant encumbrances and expenditures. Staff can enter and track purchase requisitions in Datatel. Grant project managers should become familiar with Datatel and check grant budget information often. New grant personnel should request Datatel training if needed.

Datatel is also used for student information. Course schedules, registration, transcripts and all student information is available on Datatel. If a grant program needs access to student information, contact Tamara Hoodye-Harris, Director of Enrollment Management at 409-933-8523.

## Flowchart for Funded Projects



Upon funding approval, the project should begin operations immediately to allow the needed time required to begin documenting how the funds are utilized within the guidelines of the funding agency. The primary individual responsible for the management of the project is the Project Director/Coordinator during the funding period. The key to grant management is planning, allowing for extra time to complete requests, addressing problems before a crisis, and leaving a paper train of activities.



## GRANT COMPLIANCE

Grant compliance is the basis of grants management and grant personnel should become familiar with the regulations of their funders. For federal grants, the Office of Management and Budget (OMB) has become more focused on grant compliance, requiring more oversight and review of programs. Grantees are required to ensure that funds are spent in accordance with the approved budget from the grant application and that programs are being measured.

### 13 Ways to Ensuring Compliance

The following list of suggestions is based on “true experience.” It is included in this manual for two reasons: 1.) to prevent similar mishaps, and 2.) to provide guidelines for successful grants management. Questions regarding items on the list should be directed to the Grants Compliance Officer.

**1. Get the Letter of Award:** The letter of award (Notice of Grant Award, also known as a NOGA) is received after the negotiated budget is approved and assures the College that the grant has been funded. The letter will contain information such as the grant number, the duration of the grant period, and the awarded amount. Nothing can be spent or contracted **until this letter is in hand**. Award letters may be followed by a separate contract. If not, the final submitted proposal becomes the contract of performance. However, once the budget is negotiated, it is possible to advertise for personnel with the phrase, “contingent upon grant funding” in the job description and advertisements. If the **Letter of Award will be arriving after the grant’s beginning date, get a promissory letter so that you may begin working on the grant project**.

**2. Get Off to a Good Start:** The first weeks and months of a grant are critical. Most of the paperwork is completed during this time. The budget is activated, timelines and objectives are adjusted, and personnel are hired. A grant that starts well, runs well. Delays in any startup activities cause problems throughout the entire grant period, resulting in needless complications – particularly with personnel and spending the money – and can have a negative impact on completion of grant objectives. With a good start, a grant should be running efficiently within 30 days of the funding date.

**3. Ask Questions:** For a new Project Director/Coordinator or a newcomer to the College, the sheer volume of information can be daunting. The grant project is important, and it is important for the grant to run smoothly. This manual provides a beginning. The people that form the grant networks are here to help.

**4. Give Credit to the Funding Agency:** A credit line should appear listing the agency’s full name on any piece of printed materials whether news release, brochure, or major product. If verbal presentations are given to community groups, the funding agency should be credited

there as well. A sample of all printed materials should be submitted to the Grants Office **prior** to purchase to ensure compliance with funding agency requirements.

**5. Provide Lead Time:** The grant project affects district and College services. Give people advance notice of your needs concerning grant-related issues.

**6. Keep Up with the Budget:** Grant funds represent the end result of competition with other Colleges and entities. Awarded funds are an investment by a public or private entity in the College's future. The College will be held accountable for its stewardship in using these funds. The budgets should be reviewed at least once a month to check for accuracy.

**7. Plan Carefully for Grant-Related Meetings:** Make a written agenda available to participants prior to the meeting. Use effective group management techniques to keep the meeting on track and to use time well. Follow up with meeting summaries and action on necessary items. Recording the meetings is also a good idea.

**8. Address Problems Before They Become a Crisis:** Any large project has the potential for going awry. Contact supervisors and the Grants Office when things begin to go off track to find early solutions.

**9. Don't Lobby, Don't Politic, Don't Entertain, and Don't Support Religious Activities:** All of these interesting activities are strictly prohibited with external funds. That includes using staff time for any of these items. Support letters for legislation cannot come from project staff. Food for receptions will have to come from College operational funds, if available and approved in advance, unless specified in the grant proposal.

**10. Don't Travel Out-of-State Without It:** Some funding agencies require prior approval for all out-of-state travel. Check both the College and the funding agency's travel policies and procedure before you go out-of-town and, especially, out-of-state.

**11. Keep Track of Time, Money, and Records:** One of the hallmarks of an excellent Project Director/Coordinator is paying as close attention to the financial side of the grant as to the program side. Both aspects of the grant require careful monitoring if the total program is to be successful. Meeting the program objectives is only half the job.

One of the best checks on the progress of a grant is the comparison between the percentages of the time elapsed and the percentage of the total budget spent. For example, if a grant has 80% of the time period expired and only 30% of the money spent, it is in "deep and serious trouble". The College likely will have to return unspent funds to the agency, and the objectives of the program may not be met. Sometimes, percent discrepancies indicate that expenditures are not being charged to the proper grant account. Check budget printouts

carefully so that institutional dollars are not expended on an externally funded project.

**12. Contacting Funding Agency Personnel:** Only the Grants Office staff, or individuals designated by that office, is authorized to contact funding agencies. College of the Mainland has several projects going simultaneously. Often the question can be answered by College or Grants Office Staff. Funding agency personnel could be inundated with the same questions repeatedly from every sector of the College and would conclude, rapidly, that the grant is not being managed properly.

**13. Cultivate a “Sixth Sense” About Improprieties:** If any planned action causes hesitation or even a second thought, check. In this case, permission is the best route. Impropriety can be extremely expensive – personally, professionally, and financially.

**14. Supplement, Not Supplant:** The term-supplement, not supplant is a provision common to many federal statutes authorizing grant programs. There is no single supplement, not supplant provision. Rather, the working of the provision varies depending on the statute that contains it.

Although the definition may change from statute to statute, supplement not supplant provisions basically require that grantees use state or local funds for all services required by state law or local policy and prohibit those funds from being diverted for other purposes when federal funds are available. Federal funds must supplement, add to, enhance, expand, increase, and extend – the programs and services offered with state and local funds. Federal funds are not permitted to be used to supplant – take the place of, replace – the state and local funds used to offer those programs and services.

The Grant Compliance Officer shall review and approve all purchase orders. The compliance officer review shall include a determination if the planned purchase and/or expenditure meet one of the following guidelines:

1. The grant funds will be used to enhance, expand, or extend required activities.
2. The grant funds will be used for specific grant activities included in the grant application that are above and beyond the activities funded with local funds.
3. The grant funds will be used to supplemental grant activities.

### **Remedies for Non-Compliance**

The College may be subject to consequences due to non-compliance with federal regulations. The College will strive to maintain compliance, but will respond quickly and appropriately to all notifications of non-compliance.

## INITIATING A GRANT PROJECT

A Project Director/Coordinator must be the expert on the project and must know the policies of the College, as well as learn the regulations of the funding source. Knowing this information is essential to the success of a grant. The administration of a grant requires a collaborative effort in order to implement activities and effectively manage the project. This collaborative approach ensures that there are successful outcomes and the goals of the grant will be achieved. This manual is a written resource on grant related issues. It can be used as a guide; however, please contact the Grants Office any time there is a grant related question or assistance is needed.

Every grant has rules and guidelines. Activities for a grant must follow all applicable laws, regulations, contracts, policies, and procedures. Additionally, the presence of grant funds does not prevent staff from following College regulations. There are times when a funder's rules are more flexible than the College's so always remember, **that the most restrictive rule applies.**

Communicating with a funding agency regarding a grant, at various points, may be necessary. Make sure that the name of the agency contact person for a particular grant is known and that any questions are clear and concise. Also, be aware that some funding agencies set restrictions on who they will discuss grant related issues. An example of this restriction is with a Title V grant. At the beginning of implementing a Title V grant, the College is required to submit a list of individuals who may contact the Grant Officer at the Department of Education.

### **Project Director/Coordinator**

The Project Director/Coordinator is the day-to day supervisor of the funded project. The responsibilities of this position are determined and specified by the supervisor as well as the requirements of the grant and is subject to change prior to, during, and/or after the proposal submission/award. This individual may or may not have been the program initiator, or could be a current employee who has been assigned the responsibilities from the implementation of the project.

### **State and Federal Grant Management**

Compliance with all state and federal grant requirements is essential to ensure that all grant funds remain with the College. Failure to comply with grant requirements may result in denial of reimbursement requests and or requests from the granting agency to return a portion or in some cases all grant funds.

### **Regulations for Federal Grant Awards**

All federal grant funds are subject to compliance with Administration (EDGAR) and Programmatic regulations for each grant award. For awards made prior to 12/26/2014, EDGAR Parts 74 and 80 still apply. For awards made on or after 12/26/2014, 2 CFR Part 200, which includes the substance formerly in parts 74 and 80 applies. For state-administered federal grants, the Notice of Grant Award (NOGA) the state which applicable administrative regulations apply. The date of the award

shall determine the appropriate regulations.

When College policies and/or procedures conflict with the federal regulations, the College shall comply with the more restrictive regulations, which shall be adhered to in all aspects of federal and states grants management.

**Guidelines for Regulations for Federal Grants are as follows:**

<b>Grants made prior to 12/26/2014</b>	<b>Grants made on or after 12/26/2014</b>
Circulars A-89, A-102, A-110	Uniform Guidance Subparts B, C and D
Circulars A-21, A-87, A-122	Uniform Guidance Subpart E
Circulars A-133, A-50	Uniform Guidance Subpart F
EDGAR Parts 75 to 99	EDGAR Parts 75-79 and 81-99
EDGAR Parts 74 and 80	Become part of the Uniform Guidance

**Organization of the Uniform Grant Guidance:**

- Subpart A – Acronyms and Definitions
- Subpart B – General Provisions
- Subpart C – Pre-award Requirements
- Subpart D – Post-award Requirements
- Subpart E – Cost Principles
- Subpart F – Audit Requirements
- Appendices III-V and VII – Indirect Cost/Cost Allocation Plans
- Appendix XI – Compliance Supplement

The **EDGAR** in its entirety can be accessed at:

<http://www2.ed.gov/policy/fund/reg/edgarReg/edgar.html>.

To ensure consistency with the EDGAR, the College shall utilize the acronyms and definitions included in the EDGAR for general terms related to the management of federal grant funds. The EDGAR Acronyms and Definitions can be found in CFR 200.0 through 200.99.

At the College, managing State and Federal Grants shall be a collaborative process between the Finance, Human Resources, Purchasing, and Grants Departments. Each respective department shall be responsible for their duties and responsibilities as they relate to the management of state and/or federal grants. The duties of each department are listed below in general terms. Additional, specific duties and responsibilities may be listed within the specific areas.

## Finance Department

- Preparing and posting the initial grant budget and all amendment to the general ledger.
- Assisting the HR department with determining the payroll distribution codes for all grant funded staff.
- Preparing all grant-related financial reports (monthly, quarterly, and or annually).
- Preparing all financial records for the annual financial audit and single audit, as appropriate.
- Ensuring compliance with the Financial Accountability System Resource Guide in coding all payroll and non-payroll expenditures.
- Adjusting general ledger, in reconciliation of the time and effort reports, as appropriate if adjustments are necessary.
- Managing the day-to-day cash needs for grant expenditures and drawing-down cash reimbursements, as appropriate.
- Retaining all financial records for the required length of time (7 years) for audit purposes.

## Purchasing Department

- Managing all purchasing and contractual commitments in compliance with the grant
- Managing all fixed assets and ensuring compliance with the inventory and disposition federal guidelines.

## Human Resource Department

- Assisting with the recruitment and hiring of all grant-funded staff.
- Ensuring that all grant funded staff meet the Highly Qualified Staff federal guidelines, as appropriate.
- Ensuring that all grant-funded staff sign a job description with the grant related duties and funding
- Maintaining audit ready HR employee files for financial audit or single audit purposes, as appropriate.
- Developing and maintaining salary schedules to ensure consistency between local and non-local pay rates.
- Assist with determining position title and salary information for use in competing grant application.
- Retaining all personnel records for the required length of time for audit purposes.

## Grants Department

- Working cooperatively with the administrative staff to ensure that all grant activities are collaboratively planned.
- Providing supporting documentation for budgeted grant funds. And, submitting all

- grant amendments to the finance department to facilitate budget amendments.
- Assist and review all grant related programmatic reports, monthly, quarterly, and or annually.
- Monitoring the spending thresholds throughout the grant period to ensure that the grant activities are being conducted systematically throughout the grant period.
- Reviewing and approving all purchasing and contractual commitments in compliance with the grant periods and allowable cost principles.
- Retaining all grant records for the required length of time (5 years) for audit purposes.
- Providing information to the HR department regarding the number and type of grant funded positions approved in the grant application by the granting authority.
- Verify with the HR department that all grant funded staff have a job description with grant-related duties and funding. And that all grant funded staff sign a job description on an annual basis.

**General Provision:** Acronyms and definitions related to federal grant management are listed in the EDGAR, Part 77, 2 CFR 200 and may be accessed at: <http://www.ecfr.gov/cgi-bin/text-idx?SID=bce3e6e14adb00a7863cc39935f3e35e&node=sg2.1.200.a.sg0&rgn=div7>. One of the most critical definitions are that of a “non-federal entity”. When this definition is used it refers to the College, as a recipient of a federal grant award.

1. The College has established a conflict of interest policy for all federal grant awards and shall disclose in writing any potential conflict of interest to the granting agency. The conflict of interest statement will be signed by all College staff involved in a federal grant award. A conflict of interest will be reported to the granting agency. The Grants Compliance Officer shall be responsible for overseeing and collecting the conflict of interest documentation, which are to be kept on file and updated annually.
2. The College shall comply with all additional conflict of interest requirements required by the federal granting agency or pass through entity.
3. The College shall disclose in writing to the granting agency or pass through entity any violations of federal criminal law including fraud, bribery, or gratuity violations affecting a federal grant award. Upon detection of fraud, abuse, or waste with federal grant funds, the College shall promptly notify the proper legal authorities and pursue appropriate criminal and/or civil actions. In addition, the College shall report to the granting agency and pass-through entity, the extent of the fraud or violations. The Grants Compliance Officer shall be responsible for overseeing, reporting and documenting any fraud, abuse, or waste of federal grant funds.
4. All College employees are prohibited from soliciting gifts or tokens from vendors

or other parties who are affected by or have an interest in a federal grant award.

5. All College employees are prohibited from accepting unsolicited gifts or tokens from vendors or other parties who are affected by a federal grant award.
6. College of the Mainland has a Fraud, Waste, and Abuse Hotline, listed on the College of the Mainland website under the Faculty and Staff area. All employees are encouraged to report any instances of fraud, waste, or abuse.

## **FINANCIAL and PROJECT MANAGEMENT**

### **Orientation for New Grantees**

The Grants Compliance Officer will set up an initial grant orientation meeting with project staff and administrators. At this meeting, there will be a review of the proposal, project timeline, objectives, deliverables, reporting requirements, financial reports and the budget.

#### ***Agenda for an Initial Grant Orientation***

##### **Award Review**

- Total amount awarded Budget/Project Period Objectives and deliverables
- Timelines (program as well as reports and progress meetings)
- Staffing roles and responsibilities
- Time & Effort Reporting
- Partners, collaborators and evaluator (if applicable)
- Budget set up
- Advertising positions
- Program amendments (if needed)
- Relevant upcoming dates and reports

##### **Budget**

- Expenditures
- Budget monitoring recommendations and invoicing
- Budget amendments (if needed)
- Maintaining records and files (paper trail)
- Questions and answers

The College shall implement strategies as noted below to ensure that its risk level for grants management is determined to be low:

1. Timely submission of all required programmatic and financial reports
2. Complying with the grant award fiscal guidelines and allowable cost principles.



3. Ensuring that all grant-related staff are properly trained in their respective grants management roles.
4. Implementing grant management procedures and internal controls.
5. If at any time, the College is determined to be “high-risk” recipient, it shall comply with all of the additional requirements as imposed by the funding agency. In addition, the College shall develop and implement strategies to correct the identified deficiencies in an effort to move to a “low-risk” status.

## Budget and Finance

If there are additional questions regarding finance procedures, please contact Financial Services. Financial Services staff for grants are:

Bldg./Office	Name/Position	Phone	Email
ADM -117	Dr. Clen Burton, Vice President for Fiscal Affairs	409-933-8261	<a href="mailto:clenburton@com.edu">clenburton@com.edu</a>
ADM-131	Trudy Trochesset, Controller	409-933-8464	<a href="mailto:ttrochesset@com.edu">ttrochesset@com.edu</a>
ADM-133	Kathryn Holly, Grant Accountant	409-933-8482	<a href="mailto:kholly@com.edu">kholly@com.edu</a>

When the award notification is received it should be forwarded to the Grant’s Compliance Officer. The Grant’s Compliance Officer will gather all required signatures for the award acceptance and contract. They will then forward copies of the listed below to the Grants Accountant and Program Directors.

- Official award notification or original contract
- Copy of the proposal
- Project Budget
- Any other pertinent documents to the project

The project budget cannot be set up in Datatel until an award letter or confirmation of funding has been received by the Grants Accountant.

### Accounting Procedures:

1. Upon official acceptance and receipt of the grant from the external funding agency, the Grants Compliance Officer shall review all grant information such as the grant award and contract in detail and provide a copy to the Grants Accountant.
2. The Grants Accountant will review the grant award and contract documents prior to

initiating paperwork to establish an account number and budget using the appropriate expense and revenue object codes. The Grants Accountant will then forward verification of the new account numbers to the performing department and the Grants Compliance Officer.

3. The Grants Accountant will set-up the indirect cost schedule if applicable. The Grants Compliance Officer will develop a schedule of when reports are due as specified by the grant. This information will be provided in the initial grants meeting.
4. Any possible changes in budget amounts are subject to compliance and discussed with the Grants Compliance Officer. In all cases of change, the funding agencies provisions will prevail. There must be written notification of budget changes.
5. The Program Director and Grants Accountant will discuss all grant changes. A copy of the budget revision forms will be forwarded to the performing department as well as the Grants Compliance Officer. The Grants Compliance officer is to approve all budget revisions and until approval is signed off on, funds will not be encumbered or spent.
6. The Grants Accountant will maintain the official fiscal records for all grant transactions. The Program Director will be responsible for maintaining detailed records to support the records in the Grants Accountants office. The Grants Accountant will reconcile the College grant/contract financial statements as required. This includes reconciling the payment received as well as its expenses and open commitments: funds set aside for specific vendors' payments. Any discrepancies will be brought to the immediate attention of the Grants Accountant through a memo, an email, etc. The Grants Accountant will also reconcile the grant/contract account and report discrepancies to the Program Director of the project.

Any transaction which will cause the budget line item to be over expended will be rejected by the Grants Accountant. In such cases, the entire transaction may be postponed by being returned until a memo requesting a budget transfer has been received and processed in accordance the paragraphs #4 and #5.

7. The Grants Accountant will be responsible for preparing and submitting expenditure reports and/or reimbursement documents to the funding agency. The performing department will be responsible for preparing any program reports to the funding agency.
8. All expenditures or encumbrances and personnel authorizations must be initially submitted to the appropriate Supervisor. After approval, the document will be

forwarded to the Grant Compliance Officer for signature. On all projects longer than one year, the request for funds to be encumbered for supplies and equipment must be in the Business Office at least 30 days prior to the end of the grant period. Grant and contract projects which are shorter in length will be processed accordingly and restrictions, in any case, will prevail. All goods and services paid with grant funds must be received during the term of the grant.

9. Reimbursement for services will be at actual cost or at a rate specified in the grant. Out of state travel and certain purchases, i.e., large equipment purchases, may require advance approval from the funding agency. In any case of conflict between reimbursement rates of the funding agency and the College, the lower of the two rates will prevail.
10. If a Project Director anticipates receiving program income, fees charges for services, i.e. conferences, they must analyze the budget for the income appropriately. For federal and state-funded grants, program income could result in an equivalent reduction in reimbursement from the funding agency. However, many corporate and foundation-funded grants encourage the generating of program income and do not reduce their reimbursements. The performing department should be aware that an account needs to be in place with approvals and control procedures, prior to soliciting program income.

Things to know as you begin a project:

- Become familiar with human resources, purchasing, and finance requirements for spending the project budget.
- For equipment purchases, please confirm whether or not the funding agency requires prior approval for equipment purchases.
- Supply purchases are typically encumbered as needed throughout the project period.
- Project's funds should be spent in a timely manner.
- All expenses should be encumbered at least 60 days prior to the end of the project/budget period.
- Enter the Datatel budget code/fund/org on all transactions.
- Retain documentation for all expenditures

### **Setting up the Budget**

Upon official acceptance and receipt of a grant from the external funding agency, the Grants Office shall review all grant information such as the grant award or contract in detail and provide a copy to the Grant's Accountant.

The Grants Accountant will review the grant award or contract documents prior to initiating paperwork to establish an account number and budget using the appropriate expense and revenue object codes and/or funding pools. The Grants Accountant will then forward the new account numbers to the performing department and the Grants Compliance Officer.

The Grants Accountant will set-up the indirect cost schedule if applicable. The Grants Compliance Officer will develop a schedule of when reports are due as specified by the grant.

### **Access to Budget**

Grant Directors/Coordinators with Datatel access approval will be given access to the program budget in order to complete their job duties on request. Supervisors will approve the system access forms for employees needing access to budgets if they do not already have access to Datatel. The need for access to Datatel will be evaluated on an individual basis.

New project personnel for a grant may need access to the finance area to view budgets in Datatel. Only the Grants Accountant will have access to complete approved budget transfers and manage the grant budget within the system.

In order to get access to budgets, complete the Datatel Access form (as seen in Appendix D), indicate the appropriate access, sign and forward to the appropriate supervisor for approval. Forward the completed form to the Controller for final approval. Once approved, IT will set up access.

### **Allowable Costs**

Allowable cost under the Uniform Grant Guidance, states that in order for costs to allowable, they must be:

- All expenses must be allowable, allocable, and reasonable.
- Reasonable and necessary (for example, sound business practices were followed, and purchases were comparable to market prices)
- Allowable to the federal award (meaning that the federal grant program derived a benefit in proportion to the funds charged to the program (for example if 50% of a Vice President's salary is paid with grant funds, then that Vice President must spend at least 50% of his or her time on the grant program).
- Are properly documented and accounted for on a consistent basis with generally accepted accounting principles (GAAP).
- Consistent with the provisions of the grant program
- Not used for cost-sharing or matching any other grant agreement and
- Legal under state and local law (for example, the expenditure is not prohibited under state or local laws or regulations).

#### Costs Never Allowed:

- Alcohol
- Entertainment (generally, no meals when not on travel unless specific to business conducted)
- General administrative equipment/supplies
- Sales Tax (except when unavoidable)
- Donations/Lobbying/Fines/Interest

#### Rules and Regulations

College policies and procedures regarding budgets apply to grant-funded projects

(<http://pol.tasb.org/Policy/Code/497?filter=CAM>)

For state programs, rules and regulations may be found in:

- Texas Statutes  
(<http://www.statutes.legis.state.tx.us/statutes/>)

Note: Federal regulations supersede other regulations unless the funding source or College regulations are more restrictive regulations apply. When in doubt check with the Grants Office.

#### Managing the Budget

The Project Director/Coordinator is responsible for reconciling quarterly budget reports in cooperation with the Grants Compliance Officer and Grants Accountant. Grant expenditures must be monitored on a regular basis. The Project Coordinator and Grants Accountant should monitor the budget monthly by comparing the percentage of time elapsed in the grant period and percentage of the total budget spent. This will prevent returning expended funds or over-expenditures, and will help ensure that the objectives of the project will be met.

Any possible changes in budget amounts (increase/decrease) are subject to compliance and should be discussed with the Grants Compliance Officer. Any changes to the grant award or current contract documentation need approval from the funding agency, and the approval of the performing department's Program Director and the appropriate Vice President. In all cases, the funding agency's provisions and regulations will prevail regarding any modifications. In no case should a grant budget be revised without documentation. If verbal communication is provided by the funding agency, the Program Director must follow-up with written verification. Keeping the lines of communication open is key to success.

The Grants Accountant and Grants Compliance Officer should be notified immediately if any

budgets changes or modifications are made to a grants budget. A copy of the budget revision forms should be provided to those named above. The Grants Compliance Officer will approve the revised budgets and forms, and until the budget revisions are signed off on, funds will not be encumbered or spent.

The Grants Accountant will maintain the official fiscal records for all grant transactions. The Program Director will be responsible for maintaining detailed records to support the records in the Grants Accountant's office. The Grants Accountant will reconcile the College financial statements as required. This includes reconciling the payment received as well as its expenses and open commitments: funds aside for specific vendor's payments. Any discrepancies will be brought to the immediate attention to the Program Director. The Grant's Accountant will also reconcile the grant/contract account and report discrepancies to the Program Director of the project.

The Grants Accountant will be responsible for preparing and submitting expenditure reports and/or reimbursement documents to the funding agency. The performing department will be responsible for preparing any program reports to the funding agency.

All expenditures or encumbrances and personnel authorizations must be initially submitted to the appropriate Supervisor. After approval by the supervisor, the document will be forwarded to the Grants Compliance Officer for signature. On all projects longer than one year, the requests for funds to be encumbered for supplies and equipment must be in the Business Office at least 30 days prior to the end of the grant period. Grant and contract projects which are shorter in length will be processed accordingly and restrictions, in any case, will prevail. All goods and services paid with grant funds must be received during the term of the grant.

Reimbursement for services will be at actual cost or at a rate specified in the grant. Out-of-state travel and certain purchases, i.e. large equipment purchases, may require advance approval from the funding agency. In any case, conflict between reimbursement rates of the funding agency and the College, the lower of the two rates will prevail.

If a Project Director anticipates receiving program income, fees charged for services, they must analyze the budget for the income appropriately. For federal and state funded grants, program income could result in an equivalent reduction in reimbursement from the funding agency. However, many foundation funded grants encourage the generating of program income and do not reduce their reimbursements. The performing department should be aware that an account needs to be in place with approvals and control procedures, prior to soliciting program income.

## **Contingency Budgets**

There may be times anticipated grant award notifications is not received before the new

grant year begins. The project staff and Grants staff will need to identify the expenses, usually personnel, which will need to be covered in this interim to prevent a lapse in service. The College President will approve the expenses the College will cover.

## **Travel**

In order to travel and expend travel funds in your awarded grant, travel must be an approved line item. Most grants will designate if the travel is in-district, out-of-district, or out-of-state. If your awarded grant includes travel to required meetings or conferences, these meetings must be attended by grant personnel, usually the grant director/coordinator.

The Request and Authorization for Travel (R & A) form must be completed and approved prior to any travel reservations being made by the employee. A copy of the conference agenda or event detail should be attached to the R & A. All employee travel must be approved in advance by the department supervisor or the next higher level of authority, the appropriate Dean and the appropriate Vice President who oversee the department. If the travel expenses are being paid from grant funds, the appropriate authority for that grant must approve the travel.

If the employee cannot attend an event after all reservations/registrations have been made and/or paid for, it is the employee's responsibility to cancel reservations/registrations and secure the return of funds that may have been expended. If the return of funds is not possible, the employee should attempt to find another employee to attend the event in their place. If this is not possible given time constraints, these types of situations will be reviewed on a case by case basis by the appropriate Vice President. A decision will be made at that time as to whether the college will reimburse the employee for the expense or if the employee must reimburse the college for any funds previously expended.

**Travel Advance:** A travel advance will not be made to the employee. Per diem will not be paid in advance.

The employee will be reimbursed after he/she returns from the business travel for allowable/approved expenses with proper documentation attached to the Travel-Expense Reimbursement Form. This is the preferred payment method.

If the employee cannot pay for the travel expenses up front and will be reimbursed following their return, the employee must plan in advance and coordinate with their Vice President.

All travel must follow the College's procedures:

- Use appropriate account numbers on all forms and documentation
- Travelers are expected to utilize the most cost effective mode of transportation

- Submit and obtain appropriate approval on a Travel Authorization form prior to travel. Estimate all expenses on the Travel Authorization form, indicating and anticipated method of payment for each expense type.
- College of the Mainland is exempt from Texas sales tax. Travelers may obtain a copy of the tax exempt form from the Purchasing office. If taxes are assessed, they become the obligation of the traveler except for tax on airline tickets as required by law and situations where service providers will not honor the College's Tax Exemption Certificate; hotels, restaurants, car rental companies.
- Enter requisitions for prepaid registration fees, etc. when not using College P-Card.
- Upon return from travel, submit a Travel Expense Report upon completion of travel. The Travel Expense Report should be submitted within 7 days of travel or 7 days after the end of the month for routine travel. Contact the Finance Office for assistance in completing expense reports. Meal receipts are not required; all other documentation must be provided. Travelers are required to keep original documentation according to applicable record retention policies.
- Note: some funding sources may require approval for out of district/out of state travel even if it is a line item in the budget. Refer to grant document for specifics.
- In-District Travel: within Galveston County
  - Complete a travel request in Datatel using the grant budget number on the form and when a registration fee is involved, attach to the agenda.
  - Input a Travel Reimbursement Request into Datatel for any pre-paid registration fees.
  - Send both forms through Datatel for approvals.

## **In-District Mileage**

Complete an *In-District Travel Reimbursement Request* form to be reimbursed for mileage accrued as project-related travel between and among campuses or local agencies throughout Galveston County. Mileage can be determined by odometer readings or the College's mileage chart. Submit the form, signed by the employee and supervisor, to the business office. In-district travel should be submitted monthly.

- Out-of-District; within the state of Texas but outside of Galveston county.
- Out-of-State Travel: outside of the state of Texas
- Airline Tickets: Tickets may be purchased using a College P-Card. Contact the Purchasing office for assistance if no P-Card has been issued.

**Note:** The funding agency may require prior approval for travel even though they are in the project budget. Refer to the project's contract or award document.



- Lodging: Actual lodging expenses require original receipt itemizing all charges.
- Meals: Reimbursement will be made based on approved per diem rates; eligibility is based on departure and return times. Meal receipts are not required.

## **Unallowable Costs**

An Unallowable cost is any cost that cannot be charged to the grant regardless of whether other cost are treated as a direct or indirect cost. It is important to note that while a cost may be allowable under the Uniform Grant Guidance, it may not be allowable under the terms and conditions of a grant program. Remember, each grant award has specific programmatic goals and requirements.

- Purchase of alcoholic beverages and decorations are prohibited.
- Food purchases are prohibited unless specifically included in the grant budget approved by the funding source.
- Only line items identified in the awarded budget may be used. Budget changes that affect the scope or criteria addressed in the requirements of the program required an amendment.
- Some grant funded programs state specific restrictions on expenses. Refer to the award document for information as to whether a cost is allowable.
- General Provisions for Selected Items of Cost are presented in §200.420 of the Uniform Grant Guidance. The list is not exhaustive. Failure to mention a particular item of cost is not intended to imply that it is either allowable or unallowable; rather, determination as to allow ability in each case should be based on the treatment provided for similar or related items of cost, and based on the principles described in § 200.420.
- When regulations are in conflict, the most restrictive rule will apply.

## **Cash and In-Kind Matching Funds**

For grants/contracts requiring cash match, grant managers must coordinate with the Grants Office to ensure that the matching funds are allowable and available. Funds cannot be used as a match on multiple grant/contracts. Federal funds cannot be matched with federal funds. All cash and in-kind matches required in the grant project must be documented.

The Grants Development Officer will ensure that the requirements for cost sharing and/or matching funds are approved prior to the submission of the grant application. All matching funds or cost sharing must be approved.

All staff paid with cost sharing and matching funds, shall be subject to the Time and Effort

Documentation requirements.

Cost sharing and matching funds that are a result of donated services or supplies, will be recorded and tracked in accordance with the federal regulations (CFR §200.306).

## **Indirect Costs**

An indirect cost rate allows College of the Mainland to cover indirect expenses such as utilities, facilities, and other administrative costs that represent the expenses of doing business that are not readily identified. In theory, costs like heat, light, accounting and personnel might be charged directly if those cost were easily identifiable. Practical difficulties hinder such an approach. Therefore, cost allocation plans or indirect cost rates are used to distribute those costs to benefitting revenue sources.

The Grants Office can provide the project staff with the current Federal Indirect Cost rate. Generally, most federal, state, and private funding agencies cap indirect cost rate anywhere from 5 to 10 percent. The specifics for each grant will be identified in the Grant Award documentation. Project staff only need to be aware of the amount of indirect costs in the budget. These funds are **not** available for expenditure or budget transfer to other budget lines. Financial services will calculate and deduct the indirect cost from the budget.

A grantee must have a current, approved federal indirect cost rate to charge indirect costs to the grant. The indirect cost rate is calculated using costs specified in the grantee's indirect cost plan. Those specific costs may not be charged as direct cost to the grant under any circumstances.

## **INTERNAL CONTROLS**

Internal Controls at College of the Mainland are an integral part of the organization's financial and business policies and procedures. Internal controls consist of all measures taken by the organization for the purpose of; (1) protecting its resources against waste, fraud, and inefficiency; (2) ensuring accuracy and reliability in accounting and operating data; (3) securing compliance with the policies to the organization; and (4) evaluating the level of performance in all organizational units of the organization. Internal controls are simply good business practice.

### **Responsibility**

Everyone within the College has some role in internal controls. The roles vary depending upon the level of responsibility and the nature of involvement of the individual. The Board of Trustees, the College of the Mainland President and Vice Presidents establish the presence of

integrity, ethics, competence and a positive control environment. College directors and department heads have oversight responsibility for internal controls within their departments. Managers and supervisory personnel are responsible for executing control policies and procedures within their specific areas. Each individual within a specific area is to be cognizant of proper internal control procedures associated with their specific job responsibilities.

### **Elements of Internal Control**

Internal control systems operate at different levels of effectiveness. Determining whether a particular internal control system is effective is a judgment resulting from an assessment of whether the five components – Control Environment, Risk Assessment, Control Activities, Information and Communication, and Monitoring- are present and functioning. Effective controls provide reasonable assurance regarding and accomplishment of established objectives.

**Control Environment:** The control environment, as established by the organization's administration, sets the tone of an institution and influences the control consciousness of its people. Leaders of each department, area or activity establish a local control environment. This is the foundation for all other components of internal control, providing discipline and structure. Control environment factors include:

- Integrity and ethical values;
- The commitment to competence;
- Leadership philosophy and operating style;
- The way management assigns authority and responsibility, and organizes and develops its people;
- Policies and procedures.

**Risk Assessment:** The Uniform Guidance requires all Federal agencies to conduct a risk assessment prior to making awards therefore, every entity faces a variety of risks from external and internal sources that must be assessed. A precondition to risk assessment is establishment of objectives, linked at different levels and internally consistent. Risk assessment is the identification and analysis of relevant risks to achievement of the objectives, forming a basis for determining how the risks should be managed. Because economics, regulatory and operating conditions will continue to change, mechanisms are needed to identify and deal with the special risk associated with change.

Objectives must be established before administrators can identify and take necessary steps to manage risks. Operational objectives relate to effectiveness and efficiency of the operations, including performance and financial goals and safeguarding resources against loss. Financial reporting objectives pertain to the preparation of reliable published financial statements, including prevention of fraudulent financial reporting. Compliance objectives pertain to laws

and regulations which establish minimum standards of behavior.

The process of identifying and analyzing risk is an ongoing process and is a critical component of an effective internal control system. Attention must be focused on risks at all levels and necessary actions must be taken to manage. Risks can pertain to internal and external factors. After risks have been identified they must be evaluated.

Managing change requires a constant assessment of risk and the impact on internal controls. Economic, industry and regulatory environments change and entities activities evolve. Mechanisms are needed to identify and react to changing conditions.

The Department of Education will use the high risk designation under 2 CFR 3474.10(b). The department will use the standards in the Uniform Guidance to impose specific or high-risk conditions, as appropriate, on grants.

**Control Activities:** Control activities are the policies and procedures that help ensure management directives are carried out. They help ensure that necessary actions are taken to address risks to the achievement of the entity's objectives. Control activities occur throughout the organization, at all levels, and in all functions. They include a range of activities as diverse as approvals, authorizations, verifications, reconciliations, reviews of operating performance, security of assets and segregation of duties.

Control activities usually involve two elements: a policy establishing what should be done and procedures to effect the policy. All policies must be implemented thoughtfully, conscientiously and consistently.

**Information and Communication:** Pertinent information must be identified, captured and communicated in a form and time frame that enables people to carry out their responsibilities. Effective communication must occur in a broad sense, flowing down, across and up the organization. All personnel must receive a clear message from top management that control responsibilities must be taken seriously. They must understand their own role in the internal control system, as well as how individual activities relate to the work of others. They must have a means of communicating significant information upstream.

**Monitoring:** Internal control systems need to be monitored – a process that assesses the quality of the system's performance over time. Ongoing monitoring occurs in the ordinary course of operations, and includes regular management and supervisory activities, and other actions personnel take in performing their duties that assess the quality of internal control system performance.

The scope and frequency of separate evaluations depend primarily on an assessment of risks

and the effectiveness of ongoing monitoring procedures. Internal control deficiencies should be reported upstream, with serious matters reported immediately to top administration and governing boards.

Internal control systems change over time. The way controls are applied may evolve. Once effective procedures can become less effective due to the arrival of new personnel, varying effectiveness of training and supervision, time and resources constraints, or additional pressures. Furthermore, circumstances for which the internal control system was originally designed also may change. Because of changing conditions, managements need to determine whether the internal control system continues to be relevant and able to address new risks.

### **Components of the Control Activity**

Internal controls rely on the principle of checks and balances in the workplace. The following components focus on the control activity:

**Personnel** need to be competent and trustworthy, with clearly established lines of authority and responsibility documented in written job descriptions and procedure manuals. Organizational charts provide a visual presentation of lines of authority and periodic updates of job descriptions ensures that employees are aware of the duties they are expected to perform.

**Authorization Procedures** need to include a thorough review of supporting information to verify the propriety and validity of transactions. Approval authority is to be commensurate with the nature and significance of the transactions and in compliance with College policy.

**Segregation of Duties** reduce the likelihood of errors and irregularities. An individual is not to have responsibility for more than one of the three transaction components: authorization, custody, and record keeping. When the work of one employee is checked by another, and when the responsibility for custody of assets is separate from the responsibility for maintaining the records relating to those assets, there is appropriate segregation of duties. This helps detect errors in a timely manner and deter improper activities; and at the same time, it should be devised to prompt operational efficiency and allow for effective communications.

**Physical Restrictions** are the most important type of protective measures for safeguarding College assets, processes and data.

**Documentation and Record Retention** is to provide reasonable assurance that all information and transactions of value are accurately recorded and retained. Records are to be maintained and controlled in accordance with the established retention

period and properly disposed of in accordance with established procedures.

**Monitoring Operations** is essential to verify that controls are operating properly. Reconciliations, confirmations, and exception reports can provide this type of information.

### **Internal Control Limitations**

There is no such thing as a perfect control system. Staff size limitations may obstruct efforts to properly segregate duties, which requires the implementation of compensating controls to ensure that objectives are achieved. A limited inherent in any system is the element of human error, misunderstanding, fatigue and stress. College of the Mainland employees are to be encouraged to take earned vacation time in order to improve operations while enabling employees to overcome or avoid stress and fatigue.

In all departments the cost of implementing a specific control should not exceed the expected benefit of the control. Sometimes there is not out-of-pocket costs to establish an adequate control. A realignment of duty assignments may be all that is necessary to accomplish the objective. In analyzing the pertinent costs and benefits, managers also need to consider the possible ramifications for the College at large and attempt to identify and weigh the intangible as well as the tangible consequences.

Internal controls should reduce the risks associated with undetected errors or irregularities, but designing and establishing effective internal controls is not always a simple task and cannot always be accomplished through a short set of fixes.

### **Period of Performance**

All allowable grant expenditures shall be incurred during the grant period of the federal grant award as designated on the Notice of Grant Award (NOGA). The Grant Compliance Officer will assure that all appropriate departments are aware of the grant periods for each grant award to ensure compliance as noted:

- No employee shall be hired from grant funds except during the grant period.
- No purchase obligation shall be made from grant funds except during the grant period.
- No payroll or non-payroll expenditures shall be made from grant funds except during the grant period.

All obligations with federal grant funds must occur during the grant period. Obligations that occur before or after the grant period are not allowable costs. The obligations must be liquidated in accordance with the grant deadlines, especially as they relate to the final draw-down of federal grant funds.

The Project Director/Coordinator shall monitor the expenditures during the grant period to ensure that the funds are spend in a systematic and timely manner to accomplish the grant purpose and activities. The following is an example of a 15 month spending threshold:

- Within 3 months of the grant start date 25%
- Within 6 months of the grant start date 50%
- Within 9 months of the grant start date 75%
- Within 12 months of the grant start date 100%

**Note** that optimal spending thresholds may be adjusted based on programmatic needs. For example, if a federal grant will be used for purchasing equipment needed throughout the grant life, a larger percentage of the grant will be expended at the beginning of the grant period.

## **FINANCIAL REPORTING**

### **Budget Reporting**

Grants and contracts must have funds budgeted in detail as required by the funding source. The College is required to follow the conditions of the grant that include but may not be limited to: spending funds in accordance with the approved budget of the grant; returning unused balance of grant funds; establishing property records of the grant acquired property; if so indicated; and providing program and fiscal reports at given intervals as required.

The College, auditors, must be able to compare actual expenditures to budgeted expenditures. It is important to obligate and expend funds in accordance with the approved budget. An obligation is when the College formally designates funds for a specific expense. Obligations must occur by the end date of the grant. Expenditures, which are charges to a grant or program, must be made in sufficient time to allow preparing and submitting the final expenditure report by the due date. Refer to award notification for obligation and liquidation dates. Project staff should retain appropriate documentation of expenditures according to records retention policies.

Budgets will be maintained in the Datatel Finance Module. The Grant Accountant will enter budgets and amendments upon official award notification. Grant managers can request budget

transfers within account types according to applicable regulations. Changes in function or object codes that do not affect the scope of the grant or the criteria addressed in the requirements of the Program, do not require an amendment. Project staff use Datatel to review budgets, check encumbrances, and approve documents. Contact IT for training on the use of Datatel Finance module.

### **Time and Effort Reports**

Time and effort reports (see Appendix E) and timesheets for staff are required by federal regulations to confirm the amount of time they devote to fulfilling their job responsibilities. That time includes the College budget time as well as the hours or percentages of time as stated by the grant application allocated to each activity representing a reasonable estimate of work performed. The time and effort report should be based on 100% of a person's time. For example, if he/she works 29 ½ hours a week, 29 ½ hours represents 100% effort. Time and effort reporting varies by grant and the job responsibilities of the individual charged to the grant. That "effort" may include 1) support paid by a grant as well as 2) support expended in support of a grant but not paid by the grant (in-kind or match). For example:

- A person may be paid by a grant, or more than one grant, with funds dedicated in the budget.
- A grant may state that a person will dedicate a certain percentage of hours each week to support the grant. In this case, dedicated funds might not be included in the grant budget, but the effort must be tracked to support the grant proposal. For example, if you are listed in a grant for an in-kind value of 10% of your time, 3.75 if your week would list your normal job responsibilities and 3.75 hours (10% of a 37.5-hour work week) would reflect grant activities.

### **Time and effort requirements for staff funded 100% from one grant**

The staff funded 100% from one grant do not have to maintain periodic time and effort records. However, all employees must certify in writing, at least semiannually, that they worked solely on the program for the period covered by the certification.

The timeline for semi-annual certifications shall be once per every six months. The immediate supervisor shall submit all signed semi-annual certifications to the grant accountant as noted below:

1. 1<sup>st</sup> certification – due
2. 2<sup>nd</sup> certification – due

The Grants Accountant shall collect and review all Semi-Annual Certification Forms. Any certifications that reflect a percentage other than 100% shall be adjusted for grant payroll expenditures for the certification period. Steps should be taken to ensure that the staff members work schedule is adjusted to 100% grant related, or is changed from the semiannual certification reporting to time and effort reporting.

### **Time and effort requirements for staff split funded in more than 1 grant program:**

Time and effort reporting applies to employees who do one of the following:

1. Does not work 100% of their time in a single grant program
2. Work under multiple grant programs



### 3. Work under multiple cost objectives

These employees are required to maintain time and effort records. Employees must prepare time and effort reports monthly to coincide with the College pay periods. Such reports must reflect a distribution of 100% of actual time spent on each activity and must be signed by the employee and their immediate supervisor.

Grant funded staff under the time and effort requirement must complete a time and effort form to include the date, grant source, percentage worked in the grant source per day and the summary for the month. The staff member and the immediate supervisor shall sign the time and effort report. The timeline for the time and effort report shall be once a month to coincide with monthly payroll cycles.

The immediate supervisor shall submit all signed time and effort reports to the Grants Accountant. The Grants Accountant should review for the following:

1. A review of the time and effort reports to compare the summary percentage of grant related to work per funding source to the budgeted percentage used to charge the monthly payroll.
2. If the time and effort report reflects a different percentage, the report shall be reconciled to reflect the correct payroll charges by grant funding source.

### **Approval of Grant Purchases and Expenditures**

All purchase orders with grant funds shall be reviewed and approved by the Grants Compliance Officer.

The compliance officer review shall consist of the following:

1. The expenditure is reasonable and necessary.
2. The expenditure has been approved in the grant application and is consistent with grant purposes.
3. The expenditure meets the allowable cost principles.
4. The expenditure is supplemental and not supplanting a local expenditure.
5. The expenditure has been competitively procured as required by law, as appropriate.

## **GRANT MONITORING AND ACCOUNTABILITY**

The College will ensure that all grant funds are consistently monitored throughout the grant period. The monitoring will include, but not limited to:

- Compliance with federal requirements such as cost principles, audit, report requirements, etc.
- Monitoring of grant expenditures are properly documented and meet all allowable costs.
- Monitoring grant performance such as internal controls, audit findings, over/under expenditures, etc.
- Implement strategies to deter, mitigate, and eliminate waste and fraud in expenditure of grant funds.

## **PROJECT MANAGEMENT**

When a grant award is accepted, the implementation of the project begins on a specific date and then the grantee, College of the Mainland, has to manage the grant, not only from the financial standpoint, but from a programmatic standpoint as well, until the final date of the grant award period.

The person in charge of a grant may be entitled a Director, Coordinator, Project Manager or often a Principal Investigator (PI). A principal investigator is widely used to define the person or persons who make the final decisions and supervisor of the grant and grant activities.

This role of the Project Manager to coordinate all that relates to the administrative tasks required to handle the budget, reporting, and program implementation in a way that meets generally accepted standards as well as the requirements of the funding source.

The funder will require assurance that the accounting and financial systems are in order to adequately keep track of and report on project income and expenditures. They also want to know that College of the Mainland can handle the required reporting both fiscal and programmatic and has a track record of meeting deadlines. Additionally, the funder will require good project oversight and may require an implementation timeline. The Project Manager will ensure program operates as planned, document progress, and manage these activities appropriately. The application usually lays out the information the funder wants to see.

Good project management begins prior to when the grant is awarded. Effective program design, strategic planning and program development are essential elements to success grant project. Four keys to successful project management:

1. **Regulatory Compliance:** It is important to understand and keeping up with the rapid evolution of regulations covering grants. Regulatory compliance starts with federal guides for Cost Principles and Auditing from the OMB which subsequently impacts state and other local government grants and sets models of best practices for foundation and other private grantors. But keep in mind, there are still different cost principles of different types of organizations.
2. **Best Practices:** For successful practices for project management, it is recommended to check the list below to determine what is in place. All of these must meet federal standards when applying and managing federal funds. Even if you are not applying for federal funds, implement these systems, policies and practices are essential items to consider and implement for successful grant project management. COM does have all of the following in place, and they are:
  - Accounting internal controls
  - Cash Management that meets the standards in the Cash Management Improvement Act
  - Budget Controls
  - Records Retention Policy
  - Procurement system and internal controls
  - Personnel System that complies with all laws and regulations
  - Time keeping system
  - Property Management System
  - Travel Policy
  - Auditing policies and procedures that meet standard in A=133
3. **Roles and Responsibilities:** Clearly defined roles and responsibilities can mean the difference between and successful project and losing grant funding. Managing a project is a system that includes processes at many levels. It's not just financial in nature, it is programmatic as well. Strong systems should be in place at all levels.
4. **Implementation to Close Out:** Successful management starts with the end in mind. As the project is developed, in the strategic planning phase, the final closeout should be included.

## **HUMAN RESOURCES**

Human Resources has provided the following Human Resources guidance. Please contact Human Resources for further guidance on Human Resource procedures.

Grant-funded projects must follow standard College policies and procedures regarding personnel but must also follow any specific requirements in the grant award. See the following link to the College Board of Trustees Policy Manual for Human Resources policies:

<http://build.com.edu/uploads/procedures/DC%28REGULATION%29 - Updated.pdf>

## Project Personnel

Many grant projects include funding for new personnel. When determining new positions, titles and positions must match those already established by the College. Grant-funded personnel must also be hired utilizing the College's policies and procedures for hiring all personnel. See the College hiring procedures below. All College employees must submit to a criminal background check.

### Human Resources Staff are:

Bldg./Office	Name/Position	Phone	Email
STU-223	Michael McGee, Executive Director of Human Resources/Chief Human Resources	409-933-8324	<a href="mailto:mmcgee5@com.edu">mmcgee5@com.edu</a>
STU-228	Andrea Crucian, HR Generalist/Benefit Coordinator	409-933-8408	<a href="mailto:acrucian@com.edu">acrucian@com.edu</a>
STU-226	Tham Ware, Human Resources Generalist I	409-933-8483	<a href="mailto:Tvy3453@com.edu">Tvy3453@com.edu</a>

**Hiring Grant Personnel-** College of the Mainland uses the following hiring procedures to ensure compliance:

- The department with an employment vacancy for positions other than adjunct and part-time positions shall submit a requisition/justification form and attach an updated job description to HR. HR will review the requisition and forward it to the appropriate vice president and the College President for review and approval.
- Once HR receives the approved requisition, the Director of Diversity and Equity shall notify the hiring manager that the position was approved and post the job listing on the COM website within 5 working days of receiving the approval.
  - All postings to the COM website shall remain open no less than 5 business days before the application reviews begin.
- The hiring manager will form a search committee for all contractual positions (faculty and professional positions). **Note:** All efforts will be made to maximize diversity in the membership of the search committee.
  - The hiring manager shall serve as the chair of the search committee.

- The hiring manager shall include with the requisition form, a list of the names of the search committee members including the member's job title; department; gender and ethnicity.
  - The Director of Diversity and Ethics shall insure that all members of the search committee have completed the online "Interviewing" training course and that the make-up committee complies with this regulation.
- The following search committee procedures are intended to provide for appropriate and equitable representation the committees and to ensure that all opinions regarding potential candidates receive equal consideration:
  - The search committees will have at least five and no more than seven committee members, as appropriate for that position. Exceptions must be approved by the chief HR officer.
  - Search committee will include:
    - i. The hiring manager who will serve as the search committee chair and will make the recommendation to the appropriate administrator.
    - ii. At least one Diversity Representative. A Diversity Representative is someone who has completed the 8-hour Community Respect diversity and sensitivity and cultural competency training.
    - iii. Two subject matter experts if available. One can be the hiring manager.
    - iv. One faculty member from another department for faculty searches or one employee from other department for all non-faculty searches.
- If needed, the chair of the search committee may meet with the Director of Diversity to develop and advertising strategy.
- Applications will initially be reviewed by HR and the hiring manager for minimum requirement per the position requisition, job description and job posting. Applicants meeting the minimum requirements will be forwarded to the search committee for review.
  - The role of the search committee is to screen and interview qualified applicants and recommend selection based on qualifications based on the position requisition.
- The search committee will review the applications to determine individual selected for interview and will submit the selection list to HR to schedule interviews.
  - No search committee member will be intentionally excluded from the process. All will be in attendance for the interviews except in unusual circumstances.
- Interviews will be conducted face to face however initial interviews may be conducted by telephone or video conference.
- If the appropriate administrators do not approve the recommendation, he/she will notify HR. HR will notify the chair and advise the chair that another candidate may

be recommended or the search can continue.

- Upon approval of the candidate, the search committee chair or HR will compile the following hiring paperwork.
  - Professional references to include 4 professional references including at least one supervisor and one peer.
  - Candidate Assessment Form
  - Employment verification
  - Employment application, resume, job description and unofficial transcripts.
  - Faculty Credentialing Form
  - Affirmative Action Summary Form
  - Personnel Action Form
- HR will provide a salary amount and submit the hiring packet to the appropriate administrator which, after approval will be submitted to the College President.
- Once approved, the College President will submit the approved packet back to HR.
- HR will notify the successful candidate of the approval of their hire and will offer employment to the candidate.

### ***Interviews***

The objective of the interview process is to find the person who best fits the job as it is advertised. After all of the interviews are complete, each search committee member should review all of the final candidates and provide advice to the committee chair regarding his/her opinion of the strengths and weaknesses of each candidate.

NOTE: At no time should any candidate be advised that they are the top candidate or that they are being recommended for the position.

*Interviewing:* The following is a **suggested** procedure for conducting an interview:

- The committee chairperson should introduce him/herself and the committee and thank the person for coming.
- Ask the candidate if they care for something to drink, but be prepared if they say yes.
- The chair should summarize what will take place in the interview, including a reference to the job opening and provide an overview of the job.
- If you intend to take notes during the interview, state that you will be doing so and invite the individual to do the same.
- Ask both general and specific questions about the candidate's qualifications, skills, abilities and previous job experience. These questions should be open-ended to allow more discussion and self-disclosure. The most important questions will be those relating directly to the responsibilities and competencies

of the job opening.

You should prepare a list of questions to be asked prior to conducting the interview. It's acceptable to give the candidate a copy of the questions during the interview.

- Listen carefully to the candidate's response and demonstrate that you have listened.
- Give the committee the opportunity to ask other questions or follow-up questions.
- Invite any additional questions from the candidate about the job requirements or the organization. Verify the person's interest.
- Ask if there is anything else the candidate would like to add.
- Explain the next step in the process (further interviews, when the candidate can expect to hear from you), but do not indicate acceptance or rejection at this time.
- Thank the candidate for cooperating and end the interview with a handshake.

(See Appendix F for Interviewing Do's and Don'ts and Appendix G for Tips on Interviewing Applicants with Disabilities, and Appendix H for Sample Interview Questions).

## **Employees**

### ***Part-Time Employees***

Part time hourly and adjunct personnel hours are addressed in, Board Policy Manual, DNB (Local)

### ***Full-Time Employees***

Full-time employees work at least 37.5 hour per week as addressed Board Policy Manual, DNB (Local).

### ***Full-Time Faculty***

Faculty member a person who is employed by the College on a full time bases as address in Board Policy Manual, DEC (Legal).

### ***Personnel Evaluations***

Procedures for evaluating Employees is addressed in the Board Policy Manual policy code: DLA (Local).

### ***Leave***

A 100% FTE employee working in a position requiring 12 months of service annually shall earn vacation time at the rate of 7 hours per calendar month. After completing seven years of continuous service with College of the Mainland, a 100% FTE employee working in a position requiring 12 months of service annually shall earn vacation at the rate of 10 hours per month.

A 100% full time employees employed on a 12-month basis shall accumulate local sick leave at the rate of one day per calendar month of service, which shall equal 12 working days of sick leave per year.

See the Board of Trustees Manual listed below for further information about the College's leave policies: DEC (Local)

### ***Benefits***

College of the Mainland provides a benefit package for all full-time employees. These benefits include retirement, health insurance, life insurance, tuition reimbursement and dental insurance. See the College of the Mainland Human Resources web site listed below for a description of those benefits.

<http://www.com.edu/human-resources/benefits>

### ***Worker's Compensation***

All employees are covered under worker's comp

### ***Conflict of Interest and Code of Ethics***

Grant employees must comply with the College's conflict of interest policy.

<http://pol.tasb.org/Policy/Code/497?filter=DBD>

All employees receive and acknowledge this policy manual. In addition, the Grants Office has a Conflict of Interest document that all grant employees must sign annually (see Appendix I Conflict of Interest Statement).

## **SUB RECIPIENT MONITORING**

College of the Mainland is responsible for monitoring the programmatic and financial activities of its sub recipients to ensure proper stewardship of funds. The following applies to all sub awards issued without regards to the primary source of funding. Additionally, this policy addresses responsibilities at College of the Mainland and assists grant administrators to ensure that, to achieving performance goals, sub recipients comply with applicable federal laws and regulations and with the provisions of each sub award agreement.

### **Purpose:**

OMB Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (2 CFR 200 Uniform Guidance, specifically §200.331, requires pass through entities to evaluate each sub recipient's risk of noncompliance in order to determine the appropriate monitoring level, monitor the activities of sub recipient organizations to ensure that the sub award is in compliance with applicable Federal statutes and regulations and terms of



the sub award, and verify that sub recipients are audited as required by Subpart F of the Uniform Grant Guidance.

For non-federal awards, College of the Mainland may also be required by the sponsor to provide evidence of due diligence in reviewing the ability of a sub recipient to properly meet the objectives of the sub award and account for the sponsors funds. Failure to adequately monitor the compliance of sub recipients could result in reputational damage to College of the Mainland and jeopardize current and future funding. It is the responsibility of College of the Mainland, as a pass through entity, to ensure that good stewardship of grant funding. All funds assigned to sub recipient organizations should receive the same diligence as grant funds that remain at College of the Mainland.

### **Who Must Monitor Compliance**

All grant directors and administrators at College of the Mainland who are involved with the administration and conduct of grant awards that issue and manage sub awards must comply with this policy.

### **Responsibilities of Monitoring the Sub award**

- Review past assessments to assess the risk level of potential sub recipient organizations at the time of the proposal.
- Confirm the statement of work and review any non-standard terms and conditions on the sub award during the sub award agreement negotiation process.
- Monitor programmatic progress and ability of the sub recipient to meet objectives of the sub award.
- Review and approval of sub recipient invoices
- Monitor the sub award throughout the period of performance and escalate concerns to the appropriate administrator.
- Provide quarterly reviews of sub recipients on a quarterly basis.
- Establish a sub recipient monitoring committee to work with grant directors to resolve issues on sub awards as they arise and escalate issues that cannot be resolved.
- Facilitate regular monitoring of sub awards and obtain confirmation of reviews.
- Provide records of quarterly sub award monitoring of individual sub awards and report to the sub award monitoring committee.
- Complete risk assessment on new sub recipient organizations and conduct annual assessment on active sub recipient organizations.
- Maintain the Sub Recipient Database
- Inform Administration when issues are identified with a sub recipient organization with which there is an active sub award.
- Distribute regular sub recipient monitoring reports to the managing unit.
- Schedule, run, and document the Sub Recipient Monitoring Committee meetings.
- Maintain the sub recipient monitoring organizational risk assessment process
- Conduct periodic reviews of sub recipient accounting process and recommend changes needed for improvement.

## **ISSUING AND MONITORING FEDERAL SUB AWARDS**

### **College of the Mainland will confirm that the Sub award is authorized:**

- Confirm that the sub award is included in the budget awarded by the federal agency.
- Make sure that the proposed budget has been fully funded or the sub award amount has been adjusted, as needed.
- Confirm that the Grants Compliance Officer has a complete sub award packet on file, including a letter of commitment, scope of work, and budget.
- By reviewing the sub award packet, confirm that the recipient organization is classified as a sub recipient, as opposed to a contractor, for the purpose of this project.

### **College of the Mainland assess the recipient's readiness for the sub award:**

#### **Obtain and Review Sub Recipient Financial Information**

- Obtain the sub recipient's DUNS number
- Check the SAM to confirm that the sub recipient is not on the excluded parties list and print that results page for the grant file. If the sub recipient is on that list, stop the process.
- Using the Federal Audit Clearinghouse, review the sub recipient's A-133 audit results, assessing the relevance of any issues reported to the pending sub award; request a full copy of the audit report as needed.
- If there are no A-133 audit reports, send the Sub Recipient Survey to help assess the organization's readiness to manage federal funds.
- Obtain a copy of the sub recipient's federally negotiated Facilities & Administration Rate (F & A) and fringe benefit rate agreements and confirm that the rates in the sub award budget correspond to them.
- If the sub recipient does not have a federally negotiated F & A rate agreement, confirm that the F & A rate in the sub award budget conforms to the "de minimis" rate of 10% the modified total direct cost (MTDC) available to non-federal entities that have never received a negotiated indirect cost rate.
- If the sub recipient does not have a fringe benefit rate agreement, ask the sub recipient for a breakdown of the rate used on the sub award budget.

### **If applicable. Assess the Sub Recipient's Compliance with Federal Responsible Conduct**

#### **Research (RCR) Regulations:**

- Confirm that the sub recipient has an active and enforced conflict of interest policy that meets the standards of the funding agency.
- Confirm that the sub recipient has an active and enforced research misconduct policy that meets the standards of the funding agency.
  - Note: If the sub recipient does not have such a policy, it has the option to follow College of the Mainland Policies.
- Confirm that the sub recipient has an institutional plan to conduct required RCR training.
- If the sub award will support research involving human subjects. If so, a copy of the IRB approval must be provided before the sub award can be issued.

### **Assign an Overall Risk Level**

- Drawing on the information obtained above, complete the risk assessment using the ***Sub Recipient Risk Assessment Form (see Appendix J)***.
- On the basis of the trends that emerge, place the sub recipient in the overall risk category, lower risk, medium risk, or higher risk-that seems most appropriate given the overall assessment.

### **Develop a Monitoring Plan that Reflects the Risk Level**

- Using the Monitoring Plan Template, develop a plan that reflects the sub recipient's overall risk category and the specific conditions that led to the risk classification.

#### **Standard Monitoring Plan for Lower-Risk Sub recipients:**

- A PO is created for the sub award and the appropriate Dean or VP and Grants Compliance Officer approves invoices against the PO.
- Progress reports typically required with the submission of invoices, are also reviewed by the Dean or VP and Grants Compliance Officer.
- Financial reports, typically required with the submission of invoices are reviewed by the Grants Accountant.
- The Program Manager maintains regular contact with the sub recipient, providing oversight and promptly reporting any significant issues.
- The audit reports are reviewed annually for the duration of the sub award. If findings relevant to the award are present, adjustments in the risk category and monitoring plan are made as needed.
- The monitoring plan is reviewed annually by the sub recipient Monitoring Committee and adjusted as needed in consultation with the Program Directors.

#### **Financial Monitoring:**

- The Grants Accountant will review invoices submitted by the sub recipient
  - Expenses are reasonable based upon technical progress
  - Amounts in invoices correspond to the budget
  - Invoices are submitted in a timely manner
  - Contain an authorized signature
- The Grants Accountant will request explanations for vague or unusual items (e.g., "miscellaneous")
- Desk checks & Audits
  - Review payroll distribution reports and/or effort reports
  - Provide copies of invoices, travel reports and other supporting documentation.
  - Assess internal controls and infrastructures
- Suspend payments if necessary.

#### **Additional Monitoring Steps for Medium-Risk and Higher Risk Sub recipients:**

Add any of the following steps (or other steps) as needed to complete the monitoring

plan for a medium-risk or higher-risk sub recipient. The steps added will depend upon the specific conditions that led to the risk classification:

- Review the monitoring plan semi-annually (instead of annually) and adjust as needed in consultation with the Program Directors
- Carry out “agreed-upon procedures engagements” or other forms of external audit.
- Confirm that there is a Corrective Action Plan for audit findings relevant to the sub award or inadequate internal controls.
- Request and review sub recipient policies and procedures that are relevant to the performance of the sub award.
- Require development of a more detailed scope of work with explicit understandings about methodology, procedure, and deliverables, along with consequences for not fulfilling the work scope.
- Develop a more detailed budget to better guide spending by the sub recipient.
- Restrict the sub recipient’s options to rebudget without prior approval.
- Authorize more limited allotments of time and money.
- Require additional correspondence and phone conference with the Program Directors.
- Add more invoicing requirements.
- Require supporting documentation for cost reimbursement.
- Required periodic on-site monitoring (technical and/or financial).
- Add more stringent termination or stop-work language for failure to comply with requirements.
- Include the obligation to notify College of the Mainland of any changes to audit status, compliance approvals, conflict of interest, or other material changes.
- In the argument, spell out requirements for the reporting of cost sharing by the sub recipient; as needed, develop a more detailed plan for the tracking and reporting of cost sharing.

#### **Prepare, Issue, and Report on the Sub award**

- Before issuing the sub award, wait as needed for the results of any additional sub recipient screening measures such as agreed-upon procedures engagements or review of targeted policies and procedures.
- As a general rule, use sub award agreement forms as needed for higher-risk sub recipients. As a part of the agreement, include the following information regarding Federal Award Identification required by Section 331 of the Uniform Administrative Guidance (2 CFR 200):
  - Federal Award Identification Number
  - Federal Award Date
  - Name of Federal awarding agency
  - Total amount of the federal award
  - Indirect cost rate for the Federal Award
  - Federal award project description

- Name of pass through entity
  - Contact information for awarding official
  - CFDA number and name
  - Sub recipient's name (must match registered name on DUNS)
  - Sub recipient's DUNS number
  - Sub award period of performance: Start and end date
  - Amount of federal funds obligated by this action
  - Total amount of federal funds obligated to the sub recipient
  - The indirect cost rate that applies to the sub award
  - Whether the award is for research and development
- Also include the following requirements, provisions, and certifications:
    - All flow-through requirements necessary to ensure that the sub award is used in accordance with federal statutes, regulations, and the terms and conditions of the federal award.
    - Any additional requirements that College of the Mainland needs to impose to meet its own responsibilities to the Federal awarding agency, including identification of any required financial and performance reports.
    - A requirement that the sub recipients permit College of the Mainland and auditors to have access to the sub recipient's records and financial statements, as necessary for College of the Mainland to meet its obligations as a federal pass-through entity.
    - Any additional terms and conditions associated with the sub recipient monitoring plan (especially for plans involving medium or higher risk subs).
    - A debarment/suspension certification that complies with OMB Guidelines to Agencies on Government-wide Debarment and Suspension, 2 CFR 180.
    - Appropriate terms and conditions concerning closeout of the sub award.

### **Conduct Ongoing Monitoring of the Sub award**

- Note and address any problems associated with invoicing, including late invoices or the need for further cost documentation.
- Review technical and financial reports required as part of the sub award agreement.
- Conduct other financial/technical monitoring activities that are part of the monitoring plan developed for the sub recipient.
- Review the sub recipient's A-133 audit results annually.
- Review the monitoring plan annually (or semi-annually, as indicated in the monitoring plan), to:
  - Confirm that the monitoring plan is being carried out.
  - Assess the sub recipient's level of compliance with the plan.
  - Confirm that the risk classification is still appropriate considering the sub recipient's audit results, its performance during the past year, and any recent changes in status.
- Based on the review, make any adjustments in the overall risk level and the monitoring plan that are needed.

- Consider taking enforcement action against noncompliant sub recipients as described in Section 338 of the Uniform Administrative Requirements (2 CFR 200) and in program regulations.
- Review of “programmatic reports” required under the agreement (§200.330(d)(i)).
- College of the Mainland will maintain records of the monitoring.

#### **Prompt Payment**

- Pass-through entities are expected to issue payment within 30 calendar days after receipt of the billing (§200.305 (b)(3)).
- Invoices should be reviewed and approved in a timely manner.
- The Grants Accountant will document any unexpected issues and other reasons which impact timing.

#### **Close Out the Sub award**

- Remind the sub recipient of the approaching end date and the need to wrap up any remaining work on the project and submit a final invoice.
- Review any final technical reports and deliverables to ensure that reports are complete and accurate, and that the sub recipient has met its obligations as described in the scope of work.
- Confirm that the final invoice is marked “final”.

## **PURCHASING**

**By July 1, 2018, the College will be in full compliance with the procurement requirements in the Uniform Grant Guidance.**

The College’s Purchasing Department has provided the following purchasing guidance. Please contact the Purchasing Department for further guidance on purchasing procedures. Additional guidelines can be found at:

<http://www.statutes.legis.state.tx.us/Docs/ED/htm/ED.44.htm#44.031>

#### **Purchasing Office Staff**

The following staff will be able to assist you with purchasing questions and issues.

<b>Bldg./Office</b>	<b>Name/Position</b>	<b>Phone</b>	<b>Email</b>
ADM=117	Dr. Clen Burton, Vice President for Fiscal Affairs	409-933-8261	clenburton@com.edu
MNT-116	Sonja Blinka, Director of Purchasing	409-933-8474	<a href="mailto:sblinka@com.edu">sblinka@com.edu</a>

MNT-117	Jerri Glenn, Buyer	409-933-8473	Jglenn1@com.edu
MNT-116	Fred Martorell, Shipping/Receiving Clerk.	409-933-8241	fmartorell@com.edu

**Procurement Records (§200.318 (i)):**

The Purchasing Director is responsible for ensuring compliance with all federal, state, and local procurement requirements and for ensuring that the College maintains an updated procurement history to include:

- Rationale for method of procurement
- Selection of contract type
- Contractor selection or rejection; and
- Basis for contract price

The procurement history records and other procurement records shall be retained in accordance with the federal, state, and local retention periods, whichever is greater. The procurement records shall be made available to the granting agency and auditors as appropriate.

The College's Purchasing Department falls under the Vice President for Fiscal Affairs. All grant purchases must follow the College purchasing procedures and follow College policy for purchasing. Purchasing Goods and Services are found in the Board of Trustee Policy Manual, policy code: CF, CFB, CFE, CFF, CFG, and CFH.

Purchasing requests for equipment purchased with grant funds must be submitted to the appropriate supervisor. Once a purchase request has been approved, it will then be forwarded to the Grants Compliance Officer for review. Policies of the State of Texas and College of the Mainland require Board approval of purchases greater than \$50,000. All purchases must go through the 3 quote process that exceed \$5,000 unless otherwise available under an Inter-Local Agreement or State Contract per Texas Education Code 44.031 and College of the Mainland purchasing policy BH Local. When equipment is coming from a sole source supplier, a bid is not required. It is suggested that major purchases such as equipment be complete at the beginning of the project period to avoid costly delays.

**Signature Authority:** No person is authorized to execute contracts on behalf of College of the Mainland unless authority to do so has been granted by formal written authorization of the College President.

### **Methods for Collection, Transmission and Storage of Information (§200.335):**

- When original records are electronic and cannot be altered, there is no need to create and retain paper copies.
- When original records are paper, electronic versions may be substituted through the use of duplication or other forms of electronic media provided they:
  - Are subject to periodic quality control reviews,
  - Provide reasonable safeguards against alteration: and
  - Remain readable.

### **Types of Property**

- Capital Assets
- Computing devices
- Equipment
  - Special purpose equipment
- Intangible property
- Property
- Real property
- Supplies

### **Property Classifications**

- Capital Assets (§200.12):

Tangible or intangible assets used in operations having a useful life or more than one year. Includes: Land, buildings, equipment, intellectual property, software, construction, etc.
- Computing Devices (§200.30):

Machines used to acquire, store, analyze, process, public data and other information electronically. Includes accessories for printing, transmitting, and receiving or storing electronic information.
- Equipment (§200.33):

Tangible, personal property, having a useful life or more than one year and a per-unit acquisition cost of the lesser of the two: The capitalization level established by College of the Mainland for financial statement purposes, or \$5,000.
- Special Purpose Equipment (§200.89):

Equipment which is used only for research, medical, scientific or other technical activities. Includes x-ray machines, surgical instruments, microscopes, etc.



- **Intangible Property (§200.59):**  
Property having no physical existence, such as trademarks, copyrights, patents, etc.
- **Property (§200.81):**  
Real property or personal property
- **Personal Property (§200.78):**  
Property other than real property. May be tangible or intangible.
- **Real Property (§200.85):**  
Land and land improvements, structures and appurtenances thereto, but excludes moveable machinery and equipment.
- **Supplies (§200.94):**  
Anything that is not equipment is considered supplies. A computing device is a supply if the acquisition cost is less than \$5,000 regardless of the length of its useful life.

Note: The Shipping & Receiving Clerk is responsible for the receipt of all purchased goods at College of the Mainland. All materials received are to be counted, inspected, and verified to match the purchase order. Receiving is shown in Datatel, therefore, when Accounts Payable receives an invoice, it should state a PO number. If the item is received it will show in Datatel, which serves as the approval to proceed with payment of the invoice.

#### **Prior Written Approval (§200.407):**

In order to avoid disallowance: College of the Mainland may seek prior written approval of cognizant agency (for indirect cost rate) or Federal awarding agency in advance of the incurrence of special or unusual costs.

#### **The Purchasing Process at College of the Mainland**

All purchases with grant funds shall be in accordance with the federal regulations specifically CFR 200.318. All purchases shall be purchased from a variety of qualified vendors with the ability to perform successfully under the terms and conditions of procurement. The College will strive to avoid acquisition of unnecessary or duplicative items.

- College of the Mainland departments determine their requirements for goods or services.
- Departments communicate those requirements to the purchasing department via the requisition system.
- The Purchasing Department obtains competitive pricing, maintains vendor contacts, and selects sources of commodities and services. The Purchasing Department

maintains price files for items purchased frequently.

- The Director of Purchasing, the Vice President for Fiscal Affairs, or the College attorney review all contracts.
- The Purchasing Department issues all purchase orders.
- Central receiving receives and inspects materials
- Accounts payable processes payments to the vender

Each grant will have an approval path for requisitions. After a requisition is entered into Datatel, it is sent forward for approvals. Typically, the approvers are the program director's supervisors, the Grant's Compliance Officer, and the appropriate Vice President. If computer equipment is ordered, Information Technology should be included as an approver. Each approver must approve the requisition before it gets to Purchasing and it converted into a Purchase Order. The approval path for each grant will be established when the grant budget is entered into Datatel.

#### **PROCUREMENT STANDARDS (2 CFR §200.317-326)**

- College of the Mainland has documented procurement procedures that conform to State and local laws and regulations and to the Uniform Grant Guidance in 200.317-326.
- College of the Mainland will focus on the most economical solution during the procurement process and will avoid using federal funds for the acquisition of unnecessary items. College of the Mainland will consider the use of shared services and intergovernmental agreements to foster greater economy and efficiency.
- College of the Mainland will maintain oversight to ensure that contractors perform in accordance with the terms and conditions of their contracts or purchase orders.
- Will maintain written standards of conduct covering conflict of interest and governing the performance of its employees engaged in the selection, award, and administration of contracts. No employees, officer, or agent can participate in the selection, award, or administration of contracts. This standard of conduct must provide for disciplinary action.
- College of the Mainland has documented steps and activities required to be completed for a procurement. This includes the basis for the type of procurement, contract type and the basis for the contractor selection and price.

NOTE: The Uniform Grant Guidance requires full and open competition. Contractors who assist in drafting specifications for request for proposals, must be excluded from competing for those opportunities. In addition, request for proposal specifications cannot have unreasonable requirements that are meant to limit competition. Also, procurements must be conducted in a manner that prohibits the use of geographical preferences in the evaluation of proposals, except in certain cases where federal law explicitly requires or encourages geographic preference or when contracting for architectural and engineering services, provided that

specifying geographic location leaves an appropriate number of qualified firms.

**Conflict of Interest (§200.112 and §200.318 (c)):** A conflict of interest would arise when the employee, officer, or agent, any member of his or her immediate family, his or her partner, or an organization with employee or is about to employ any of the parties indicated herein, has a financial or other interested in or a tangible personal benefit from a firm considered for a contract. College of the Mainland is required to maintain written standards of conduct, including conflict of interest policies.

A conflict of interest arises when any of the following has a financial or other interest in the firm selected for the award:

- Employee, officer or agent,
- Any member of that person's immediate family,
- That person's partner, or
- An organization which employs, or is about to employ, any of the above or has a financial interest in the firm selected for award.

Section 200.318 (c) of the Uniform Grant Guidance describes mandatory conflict of interest language. College of the Mainland follows the policies for Employee Conflict of Interest and Organizational Conflict of Interest. They are described in detail below:

**Employee Conflict of Interest:** College of the Mainland will maintain written standards of conduct covering conflicts of interest and governing the performance of its employees engaged in the selection, award, and administration of contracts.

Specifically, no employee, officer, or agent of College of the Mainland must participate in the selection, award, or administration of a contract supported by a Federal award if he or she has a real or apparent conflict of interest. Such a conflict would arise when the employee, officer, or agent, any member of her or her immediate family, his or her partner, or an organization which employees or is about to employee any of the parties indicted herein, has a financial or other interest in or a tangible personal benefit from a firm considered for a contract. The officers, employees, and agents of College of the Mainland must neither solicit not accept gratuities, favors, or anything of monetary value from contractors or parties to subcontracts. However, College of the Mainland entities may set standards for situations in which the financial interest is not substantial or the gift is an unsolicited item of nominal value. The standards of conduct must provide for disciplinary actions to be applied for violations of such standards by officers, employees, or agents of College of the Mainland.

Conflict of Interest statements will be signed be College of the Mainland grant employees at the time of the implementation of a new grant and updated annually in September, as grants continue.

**Gratuities (§200.318 (c)(1):** Officers, employees, and agents of College of the Mainland must neither solicit nor accept gratuities, favors, or anything of monetary value from contractors or parties to subcontracts. However, College of the Mainland does have set standards for situations in which the financial interest is not substantial or the gift is unsolicited item of nominal value.

**Organizational Conflict of Interest (§200.318 (c)(2):** Organizational conflicts of interest means that because of relationships with College of the Mainland, affiliate, or subsidiary organization, the entity is unable to **or appears** to be unable to be impartial in conducting a procurement action involving a related organization.

The Purchasing Director shall execute the Organizational Conflict of Interest document to disclose if any conflicts exist in the application, receipt of, or expenditure of grant funds.

No employee, officer, or agent may participate in the selection, award, or administration of a contract supported by a grant award if he or she has a real or apparent conflict of interest. In addition, no employee, officer or agency of the College may neither solicit nor accept gratuities, favor or anything of monetary value from contractor or parties to subcontractors.

**Duties to Report Conflicts (§200.112 and §200.113):** College of the Mainland employees, must disclose in writing any potential conflict in accordance with applicable Federal awarding agency policy within 30 days of the becoming aware of the occurrence.

Also, COM employees must disclose in a timely manner in writing all violations of Federal criminal law involving fraud, bribery, or gratuity violations potentially affecting the Federal award.

**Procurement Standards cont.:**

- According to §200.318(d) College of the Mainland will avoid acquisition of unnecessary or duplicative items. Consideration will be given to consolidating or breaking out procurements to obtain a more economical purchase. Where appropriate, a lease-purchase analysis should be conducted.
- According to §200.318 (e) College of the Mainland will enter into state and local intergovernmental agreements or inter-entity agreements where appropriate for procurement or use of common or share goods or services.
- According to §200.318(f) when appropriate, College of the Mainland will use Federal excess and surplus property in lieu of new equipment or property.
- College of the Mainland will use value engineering clauses in construction contracts of sufficient size (§200.318 (g)). Value engineering is defined as the systematic and

creative analysis of each contract item or task to ensure that its essential function is provided at the overall lower cost.

- College of the Mainland will ensure that contracts are awarded only to responsible contractors possessing the ability to perform successfully (§200.318 (h)). Consideration will be given to contractor integrity, compliance with public policy, past performance and financial and technical resources.
- College of the Mainland will maintain records sufficient to document the rationale for the following (§200.318 (i)):
  - Procurement method
  - Selection of contract type
  - Contractor selection or rejection, and
  - Basis for contract price.
- College of the Mainland will only use time and materials (T & M) contracts if after a determination that no other contract is suitable and if the contract includes a ceiling price that the contractor exceeds at his own risk (§200.318 (J)).
- College of the Mainland is solely responsible for good administration practices and sound business judgment, and for the settlement of all contractual and administrative issues arising out of procurements.

**Open Competition** (§200.319 (a)): All of College of the Mainland procurements will be conducted in a manner that provides full and open competitions. To eliminate an unfair advantage, contractors that develop or draft specifications, requirements, statement of work, and invitations for bids or RFP's must be excluded from competing for such procurement.

Situations that are considered to be restrictive to open completion are:

- Placing unreasonable qualifying requirements on firms
- Requiring unnecessary experience and excessive bonding requirements
- Noncompetitive pricing practices between firms or affiliated companies
- Noncompetitive contracts to consultants that are on retainer
- Organization conflicts of interest
- Specifying on a "brand name" instead of allowing for "an equal" product consideration
- Arbitrary actions in the procurement process

(§200.319 (b)): College of the Mainland will not use statutorily or administratively imposed state of geographical preferences in competition decisions, unless mandated by federal statute, or in case where a state license, such as architectural or engineering, may be required to perform a project in your state.

**Procurement Requirements** (§200.319 (c)): College of the Mainland has written procedures for procurement transactions that will ensure:

- Clear and accurate description of the technical requirements for material, product or services.
  - Description will not contain features which unduly restrict competitions if it is a competitive bid
  - Detailed project specifications will be avoided if possible
  - A “brand name” description can be used to define performance or other important requirement when it is impractical or uneconomical to make a clear and accurate description of the technical requirements
- Identify all of the requirements that offerors must fulfill and all other factors to be used in evaluating bids or proposals.

(§200.319 (d)): College of the Mainland will ensure that all prequalified lists of person, firms, or products that are used are current and include enough qualified sources to ensure maximum open and free competition.

- College of the Mainland will not preclude a potential bidder from qualifying during the solicitation period.

**Procurement without Competition: (§200.320 (a)):**

- Micro-purchases, \$10,000 or less, do not require competition or a cost/price analysis, but must be distributed equitably among qualified suppliers (to the extent practicable). \$2,000 for construction awards subject to the Davis-Bacon Act. (No quotes and equitable distributions).
- Micro-purchases may be awarded without soliciting competitive quotations IF the non-Federal entity considers the price to be reasonable.

**Procurements requiring competition or cost-price analysis: (§200.320 (b-f)):**

- Small purchases, \$3,500 - \$149,000, price and rate quotes must be obtained from an adequate number of qualified sources. **NOTE: no cost/price analysis required.** (Rate quotes and no cost or price analysis)
- Sealed bids using firm fixed price contract, require formal advertising, two or more bidders are willing and able to respond, and there is public opening of the bids. (Greater than \$150,000, construction projects, and price is a major factor).
- Competitive proposals used when sealed bids is not appropriate, requires advertising, includes a written method for conducting the technical evaluation, responses must be solicited from an adequate number of qualified sources, normally more than one source submitting an offer and the award is either fixed price or cost reimbursable. (Greater than \$150,000, fixed price or cost reimbursement, request for proposals with evaluation methods).
- Procurement by noncompetitive proposal (sole source) is used when the items are only

available from a single source. One or more of the following must apply:

1. Available only through a single source
2. Public exigency or emergency will not permit delay required for competition
3. Awarding agency has expressly authorized a noncompetitive process, or after solicitation of a number of sources
4. After solicitation of a number of sources, competition is deemed inadequate.

### **Procurement Documentation**

College of the Mainland will maintain records to sufficiently detail the history of procurement. At a minimum this includes:

- The rationale for the method of procurement,
- The selection of contract type.
- The contractor selection or rejection, and
- Basis for the contract price.

\*Time and Materials (T & M) contracts are only acceptable to be used after a determination that no other contract is suitable and if the contract includes a ceiling price that the contractor exceeds at his own risk.

\* College of the Mainland will maintain sole responsibility for good administrative practices of sound business judgment, and for the settlement of all contractual and administrative issues arising out of procurements.

Other Procurement Items to Note:

- Per section §200.319 of the Uniform Grant Guidance, the language prevents contractors of College of the Mainland to develop or draft specifications, requirements, statements of work, and invitations for bids or requests for proposals from competing for such procurements.
- Per section §200.319c of the UGG, College of the Mainland will maintain written procedures for procurement transactions.
- College of the Mainland will maintain oversight to ensure that contractors perform in accordance with the terms, conditions, and specifications of the contract or purchase order.

### **PROCUREMENT METHODS**

**There are five procurement methods outlined in the Uniform Grant Guidance (§200.320) to include:**

**Procurement by micro-purchase (§200.320 (a)):** Procurement by micro-purchase is the acquisition of supplies or services when the aggregate dollar amount of which does not

exceed \$10,000 (or \$2,000 in the case of acquisitions for construction subject to the Davis-Bacon Act). Micro-purchases may be awarded without soliciting competitive quotations if the price is considered to be reasonable. When practical, the entity should distribute micro-purchases equitably among qualified suppliers. No competitive quotes are required if management determines that the price is reasonable.

**Procurement by small purchase procedures (§200.320 (b)):** Small purchase procedures are used for securing service, supplies, or other property that do not cost more than the Simplified Acquisition Threshold (currently \$250,000). If small purchase procedures are used, price or rate quotations must be obtained from an adequate number of qualified sources. The standards do not define how many quotations constitute an “adequate number”, this is a matter of judgment. This method is relative simple and informal and College of the Mainland may set a lower threshold.

**Procurement by competitive sealed bids (§200.320 (c)):** Used for purchases over the Simplified Acquisition Threshold, which is currently \$250,000. Under this purchase method, formal solicitation is required, and the fixed price (lump sum or unit price) is awarded to the responsible bidder who conformed to all material terms and is the lowest price. This method of procurement is the most common and appropriate to use:

- A complete, adequate and realistic specification or description of good or service is available;
- Two or more responsible bidders are willing and able to compete effectively for the business;
- Selection of vendor can be made principally on price and it's a firm fixed price contract.

Sealed bids must:

- Provide sufficient time to submit bids
- Include all specifications so bidders can properly respond; and
- Be publicly opened at time and place announced in invitation for bids.

Any and all bids may be rejected if there is a sound **documented** reason. Award is made to the lowest responsive and responsible bidder.

**Procurement by competitive proposals (§200.320 (d)):** Used for purchases over the Simplified Acquisition Threshold, which is currently \$250,000. This procurement method requires formal solicitation, fixed-price or cost-reimbursement contracts, and is used when sealed bids are not appropriate. The contract should be awarded to the responsible firm whose proposal is most advantageous to the program, price and other factors. This method is used when conditions are not appropriate for the use of sealed bids.



For Competitive Proposals:

- Request for proposal (RFP) must be publicized and identify all evaluation factors and their relative importance identified.
- Proposals must be solicited from an adequate number of sources.
- Must have method for evaluating proposals and selecting the vendor.
- Contracts must be awarded to the responsible vendor whose proposal is most advantageous to the program, considering the price and other factors.

**Noncompetitive proposals (§200.320 e):** Also known as the sole-source procurement, this may be appropriate only when specific criteria are met. For a **sole source**, there is no other like item(s) or product(s) available for purchase that would serve the same purpose of function and there is only one price for the item because of exclusive distribution or property rights. Noncompetitive contract tends to raise “red flags”. Be sure to provide persuasive and adequate documentation to facilitate and audit.

**Sole Source (§200.320 (f)):**

This method of **sole source** may be used only when one or more of the following circumstances apply:

- The item is available only from a single source;
- The public exigency or emergency for the requirement will not permit a delay resulting from competitive solicitation;
- The federal awarding agency or pass-through entity expressly authorizes noncompetitive proposals in response to a written request from the non-Federal entity;
- After solicitation of a number of sources, competition is determined inadequate
- An item for which competition is precluded because of the existence of a patent, copyright, secret process, or monopoly;
- A film, manuscript, or book;
- A utility service, including electricity, gas, or water; and
- A captive replace part or component for equipment.

**Sole Source Justification Criteria:** Examples of good criteria used to justify using Sole Source are:

Concrete Justification:	Unique Expertise, Background, or Education
	Need for Identical equipment already in use
	Supplier named by the funding source
	Medical/Surgical Decision
	One Manufacturer of OEM Repair or Maintenance

Insignificant Justification:    Friendly sales staff  
   Nice Logo or Website  
   Personal Recommendations

**Notes on Procurement Methods (§200.320):**

- Per the COFAR, no matter the dollar amount, if a particular source to acquire items is needed for scientific reasons, this constitutes the use of single source procurement.
- Strategic Sourcing and Shared Services:
  - College of the Mainland may apply the requirements for competition in the methods of procurement in broader procurement decisions in order to leverage strategic sourcing agreements, shared services arrangements or other practices that result in more efficient use of the funds.
- Procurement and Charge Cards:
  - The Uniform Grant Guidance does not limit charge card purchases to a particular threshold amount, however you still need internal controls, and the methods for procurement still apply (micro-purchases, small purchases, single-source, etc.)
- Note: The Uniform Grant Guidance procurement standards only apply to goods and services that are directly charged to a Federal Award, including sub recipients of Federal awards.

**THE CONTRACTING PROCESS**

**Suspension and Debarment**

College of the Mainland cannot contract with a vendor who has been suspended or debarred as noted in <http://www.sam.gov>

**Contract Administration (§200.318):**

College of the Mainland must maintain oversight to ensure that contractors perform in accordance with the terms, conditions, and specifications of the contract. All contracts over \$25,000 must be reviewed.

**Contract Provisions (§200.326):**

Appendix II of the Uniform Grant Guidance includes required provisions

- Administrative, contractual, legal remedies
- Termination for cause or convenience
- Equal Employment Opportunity requirements
- Davis-Bacon Act
- Etc.

## **INVENTORY**

### **Equipment Standards (§200.313 (c-e)):**

- College of the Mainland must have adequate controls in place to account for equipment.
- College of the Mainland cannot “encumber” the property without approval.
- All equipment must be used by the program or project for which it was acquired and as long as needed.
- When the equipment is no longer needed it may be used by other activities in accordance with priority
  - Activities funded by the same Federal awarding agency
  - Activities funded by other Federal awarding agencies
- Must make equipment available to use on other projects or programs provided that such use will not interfere with the work on the projects or program for which it was originally acquired.
- When grantee acquiring replacement equipment, the equipment to be replace may be used as a “trade-in” without recourse to federal agency.

### **Inventory Management System (§200.313 (d)):**

- Property Records
  - Description, serial number or other ID, title info, acquisition date, cost, percent of federal participation, location, use and condition, and ultimate disposition.
- Physical inventory
  - At least once a year and reconciled with records
- Control system to prevent loss, damage, theft
  - All incidents must be investigated
- Computing devices (§200.302 (b) (4)):
  - Internal controls: regardless of cost, grantee must maintain effective control and “safeguard all assets and assure that they are used solely for authorized purposes.”

### **Disposition of Equipment (§200.313 (e)):**

When equipment is no longer needed, College of the Mainland must request disposition instructions from the federal awarding agency if required by the terms of the grant.

- Over \$5,000 – pay federal share (explained in UGG)
- Under \$5,000 – no accountability

### **Disposition of Supplies (§200.314):**

If there is a residual inventory of unused supplies exceeding \$5,000 in total aggregate value upon termination or completion of the project or program and the supplies are not needed for any other federal award, College of the Mainland must compensate the federal government for its share.

**Procurement and Affirmative Action (§200.321):****Small and Minority Businesses, Women –Owned Businesses, and Labor Surplus Area Firms-**

As required in the Uniform Grant Guidance, College of the Mainland will take the following affirmative steps to ensure these firms are used when possible:

1. Place qualified small, minority, and woman-owned businesses on the solicitation list;
2. Assure that such business is solicited when they are potential sources;
3. Divide total requirement, when economically feasible, into smaller tasks or quantities to permit maximum participation by such businesses;
4. Establish delivery schedules, where requirements permit, which encourage such business to respond;
5. Use services and assistance from such organization as SBA, Minority Business Development Agency of the Department of Commerce; and
6. Required prime contractors to take the same affirmative steps.

**Procurement of Recovered Materials (§200.322):**

College of the Mainland will comply with §6002 of the Solid Waste Disposal Act, for procuring items designated in the EPA guidelines of 401 CFR 247 requiring:

- Procurements must contain the highest percentage of recovered materials practical, consistent with maintaining satisfactory levels of competition, when the purchase price exceeds \$10,000 or the value of the quantity procured in the preceding fiscal year exceeded \$10,000;
- Procuring solid waste services in a manner that maximizes energy and resource recovery; and
- Establishing an affirmative procurement program for recovered materials.

**Contract Cost and Price (§200.323)**

1. Every procurement in excess of the Simplified Acquisition Threshold (\$250,000) must have a cost or price analysis performed, including contract modifications. The method and degree of analysis can vary given the situation, but as a starting point, you must make independent estimates before receiving bids or proposals.
  - Cost analysis generally means evaluating the separate cost elements that make up the total price (including profit).
  - Price analysis generally means evaluating the total price.
2. Profit must be negotiated as a separate element of the price for each contract in which there is not price competition and in all cases where cost analysis is performed.
3. Cost or prices based on estimated cost for contracts are allowable to the extent that the cost incurred or estimates included in the negotiated prices would be allowable under the Federal cost principles.
4. Cost plus a percentage of cost must not be used.

NOTE: Contracts must contain the applicable provisions of Appendix II of 2 CFR (§200.326)

### **Procurement Review (§200.324)**

- College of the Mainland must make available, upon request, technical specifications on proposed procurements to ensure the item or service is the one being proposed for acquisition. Typically, this review takes place prior to procurement, but can occur post solicitation.
- College of the Mainland must make available for the agency or pass through entity (PTE) procurement documents when:
  - Procurement processes or standards fail to comply with 2 CFR 200.
  - Procurements are expected to exceed the Simplified Acquisition Threshold and is to be awarded without competition or is awarded under sealed bid to entities other than the low bidder, specifies and “brand name”, or is a contract modification that changes the scope or increases the scope by more than the “Simplified Acquisition Threshold”.
- College of the Mainland is exempt from the pre-procurement review if the agency or PTE determines the systems meet the standards of 2 CFR 200.
- College of the Mainland may request that its procurement system be reviewed by the awarding agency to determine whether its systems meets these standards. Generally, these review occur where there is continuous high-dollar funding, and contracts are awarded on a regular basis. College of the Mainland may also self-certify its procurement system, but such certification does not limit awarding agency rights to the review the system.

### **Bonding Requirements (§200.325):**

Bonding may be required for construction/facility improved contracts/subcontracts exceeding the Simplified Acquisition Threshold to ensure that the Federal interest in the procurement is adequately protected. The minimum requirements include:

- A bid to guarantee equal to 5% of the bid price to ensure that post bid selection that the successful bidder will enter into a binding agreement for the work.
- A performance bond to secure fulfillment of the contractor’s obligations for 100% of the contract price.
- A 100% payment bond to assure payment as required by law of all persons supplying labor and materials in performance of work specified in the contract.

### **Contract Provision (§200.326):**

All of College of the Mainland contracts will contain applicable provisions described in Appendix II of Part 200 – Contract provisions for non-Federal Entity Contracts under Federal Awards.

Appendix II covers:

- Contracts in excess of \$150,000 must address administrative, contractual,

or legal remedies in instances where contractors violate or breach contract terms, and provide for such sanctions and penalties as appropriate.

- Contracts greater than \$10,000 must address termination for cause and for convenience by the non-Federal entity including the manner by which it will be effected and the basis for settlement.
  - Equal Employment Opportunity (all federally assisted construction contracts)
  - Davis-Bacon Act (prime construction contract >\$2,000)
  - Contract Work Hours and Safety Standards Act (>\$100,000 where mechanics or laborers)
  - Rights to Inventions Made Under a Contract or Agreement
  - Clean Air Act and Federal Water Pollution Control Act (>\$150,000)
  - Byrd Anti-Lobbying Amendment (>\$100,000)
  - Debarment and Suspension

### **Procurement Card (P-Cards)**

College of the Mainland offers the P-Card System Program to College employees as a convenient purchase and payment tool. The program provides the means for the purchase and payment of non-restricted goods and services. It is a fast, flexible alternative for purchasing from vendors that accept the MasterCard Credit Card. The P-Card Program Administrator will administer the program in compliance with the applicable federal, state, and local laws and regulations. The P-Cardholder will be accountable for the safekeeping and authorized use of the P-Card through compliance with established policies and procedures.

The P-Card payment is due once a month and includes all charges made by employees/departments who have been assigned a P-Card for the current billing cycle. The overall billing statement is received in the Financial Services Department. Accounts payable (AP) will send out an email to anyone who currently has charges on the billing statement to notify them of the deadline date that all completed documentation is required in AP in order to process a timely payment. It is the P-Cardholder's responsibility to complete their expense report with supporting documentation and proper approval signatures before submitting to AP.

AP Will verify the following prior to processing the payment of the P-Card:

- Charges listed on the expense report match the current billing charges for each P-Card
- An expense description and correct account number are listed for each expense.
- Accurate approval signatures are present.
- Adequate documentation/itemized receipts are attached for each charge on the report.
- Each charge complies with College policy and that sales tax has not been charged.

After completion of the processes above, AP will enter the payment voucher for each charge to be paid on one check payable to JPMC. If necessary, AP will complete a monthly audit report to be submitted to the Controller, Purchasing Director, Vice President of Fiscal Affairs, and the P-Card Administrator identifying any issues encountered with the monthly employee/departments

P-Card submissions.

The P-Card may not be used to for information technology, software or classroom instructional materials.

See the following link for a training regarding the use of P-Cards:

[http://build.com.edu/uploads/sitecontent/files/purchasing/Purchasing\\_Training\\_081715.pdf](http://build.com.edu/uploads/sitecontent/files/purchasing/Purchasing_Training_081715.pdf)

The P-Card manual contains the following information needed to use P-Cards.

### **P-Cards Guidelines Overview**

#### **Policies and Procedures**

- Introduction
- How It Works
- Definitions
  - Cardholder's Supervisor
  - Cardholder Supervisor Agreement
  - Cardholder
  - Cardholder Agreement
  - Default Account
  - Detailed Transaction Summary
  - P-Cared Request Form
  - Expense Report
  - Procurement Card (P-Card)
  - Program Administrator
  - Purchasing Limit
  - Statement of Dispute Form
  - Support Documentation
- Receiving the P-Card
- Guidelines
  - Individual Cardholder
  - Department Cardholder
  - Financial Services Accounts Payable Cardholder
- Unauthorized and/or Inappropriate Use of the P-Card
- Receipt of Materials and Services
- Return, Credits and Disputed Charges
  - Credits
  - Disputed Charges
- Expense Report
- Reconciliation
- Payment & Account Distribution

- Reporting a lost or Stolen P-Card
- P-Card Termination
- Independent Review of Cardholder Transactions
- Outstanding Transactions

### **Bid Process**

Any purchase that is over \$50,000 must go through the College's big process

## **CONCLUSION**

We hope that the information provided in this Grants Guide will be of assistance to you as you pursue federal, state local and private grants. The Grants Office is happy to assist you as you pursue funding. As mentioned earlier in this document, the College has a Grants Office which consists of a Grants Development Officer and a Grants Compliance Officer. Also working with grant projects are a Grants Accountant and several Grant Managers, or Directors or Coordinators. You will find this group helpful as you write and implement new grant programs.

Many of the members of the grants community are seasoned grants managers and will be a valuable resource for you. Please feel free to contact the Grants Office if you have any questions.

Compliance issues are very important in the administration of any grant, but most especially Federal grants. The new Uniform Grant Guidance that was implemented December 2014 brought many changes. The Grants Office has several manuals with helpful information about managing the new Federal Guidelines. Please contact that office if you need further clarification on UGG requirements.

In order to manage grant compliance with the new Uniform Grants Guidance, you will be asked to complete various forms of information about your grant so that we can monitor grants progress. The Grants Compliance Officer will contact you regarding the completion of that information.



**College of the Mainland  
Grant Review and Approval Form (GRAF)**

*This form must be completed for all requests for funding from organizations outside of the College. Upon approval or disapproval of Presidents Cabinet, you will be contacted by the Grants Development Officer.*

**1. Project Overview (or description of need)**

Date: \_\_\_\_\_

Project title (or need for funds): \_\_\_\_\_

\_\_\_\_\_

Population to be served: \_\_\_\_\_

Brief overview of project: \_\_\_\_\_

\_\_\_\_\_

Amount requesting: \_\_\_\_\_

What will be purchased by the grant (give approximation)?

\$ \_\_\_\_\_ Personnel: \_\_\_\_\_

\$ \_\_\_\_\_ Equipment: \_\_\_\_\_

\$ \_\_\_\_\_ Other: \_\_\_\_\_

**2. Project Lead and Proposal Writing Team**

*(These are the departments and/or people who need to be involved in writing the grant)*

Proposed Project Director/Lead: \_\_\_\_\_

Title: \_\_\_\_\_ Phone: \_\_\_\_\_

Department: \_\_\_\_\_

Others on Proposal Writing Team:

Name

Department

Phone

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

APPENDIX A  
The Grant Review and Approval Form

\*\*\*\*\*

*If you have a specific grantor in mind, please fill out the information below in addition to that above.*

**3. GRANTOR INFORMATION:**

Funder: \_\_\_\_\_ Grant Name: \_\_\_\_\_

Grant Application Due Date: \_\_\_\_\_ Is a Letter of Intent Needed: \_\_\_\_\_

Grant Amount: \_\_\_\_\_

**4. GRANT Period:**

\_\_\_\_\_ New Grant

\_\_\_\_\_ Re-application for an existing grant: \_\_\_\_\_ Competitive \_\_\_\_\_ Non-Competitive

Duration of project: \_\_\_\_\_ One-time grant \_\_\_\_\_ Multiyear grant

Length of project: \_\_\_\_\_ Expected Start/End dates: \_\_\_\_\_ / \_\_\_\_\_

**5. SIGNATURES:**

\_\_\_\_\_  
Vice President

\_\_\_\_\_  
Dean (if applicable)

*Please return the form to Susan Weeks, [sweeks1@edu](mailto:sweeks1@edu). Call if you have any questions – ext. 8419*

\*\*\*\*\*

**Administrative use only**

\_\_\_\_\_  
Date reviewed by President's Cabinet: \_\_\_\_\_ Decision: \_\_\_\_\_

Comments:

\_\_\_\_\_  
\_\_\_\_\_

APPENDIX B  
Grant Decision Form

**The Grant Decision Form**

<b>Proposed Project:</b> <hr/>				<b>Decision:</b>  ___ Go ___ No ___ Go
<b>Funding Source:</b> <hr/>				
<b>Amount Requested:</b> _____ <b>College Match? If yes, explain:</b> _____				
Decisions Factors	WEIGHTED CRITERIA			Rating
	Negative (Score: 0)	Neutral (Score: 1)	Positive (Score: 2)	
1. <b>FIT</b> with mission, goals and objectives, and current priorities	Does not fit	Marginally fits	Clearly fits and advances agenda	
2. <b>EXPERTISE</b> of Proposed PRINCIPAL INVESTIGATOR(S)/ Project Manager PI/PM	Little or no experience	Some experience	Extensive experience	
3. <b>EXPERTISE</b> of Grant Proposal Development <b>TEAM</b>	Little or totally new area	Average experience in this area	Strong expertise in this area	
4. <b>CAPABILITY</b> of Grant Proposal Development Team to respond to RFP	Do not have staff time to adequately respond	Stresses staff time, but able to respond	Have staff time to develop highly competitive proposal	
5. Financial <b>OBLIGATION</b> (space, personnel, matching funds)	Requires significant investment of college resources	Requires investment of college resources	Requires minimal investment of college resources	
6. Return on Investment of <b>STAFF TIME</b> , including IT, business office etc.	Small return	Moderate return	Significant return	
7. Return on Investment of <b>COLLEGE/CAMPUS RESOURCES</b>	Small return	Moderate return	Significant return	

[Type here]

APPENDIX B  
Grant Decision Form

8. Project <b>SUSTAINIBILITY</b>	Difficult to sustain	Sustainable with a moderate amount of additional resources or the modification of existing programming	Sustainable with minimal additional resources	
9. Suitable External <b>COLLABORATORS</b>	No partners exist	Potential partners exist and are identified	Partners exist and are involved	
10. Assessment of funding <b>PROBABILITY</b>	Competition is very strong, odds under <20%	Open competition, odds are 20-50%	Open competition, odds exceed >50%	
11. <b>FUNDING AGENCY</b> contact, history, and rapport	College is unknown to this agency and staff	College is known to this agency and staff	College has well-developed working relationships	
<b>Total Score (sum of scores for each factor evaluated)</b>				

Scoring Key: Negative = 0-7 Neutral = 8-15 Positive = 16-22

Appendix C  
Sample Timelines

Scope of Work	Tasks	Deliverables <b>*Deliverables marked with asterisk and in italics are required in the RFP</b>	Due Date
<b>Phase 1:</b>  <b>Initiate the Common Core Professional Development Project at College 1 and College 2</b>	Receive notification of funding, complete paperwork required for contract; attend meetings as required; initiate project	Signed paperwork as required; approved budgets/expenditures, documented attendance as required in kick-off meeting	Month 1
	Develop the detailed comprehensive work plan for the project-including deliverable completion and delivery dates.	<i>*Project's comprehensive work plan completed and approved.</i>	Month 1 (first 15 days)
	Develop and begin implementation of a plan for communication with the following: <ul style="list-style-type: none"> <li>FSU- Developer of the Teacher Standards tool</li> <li>County-level personnel in 18 district-school board offices.</li> <li>School-level personnel, faculty, and others who will receive training.</li> <li>Frequent contact with the DOE/state level personnel about the progress of the project and its deliverables.</li> </ul>	*Completed Project Communication Plan  (Including communication methodologies and timelines to address the following: Advisory committee, vendors, DOE, teacher education programs, school districts, product updates, user feedback to products, and system of marketing awareness and implementation plan)	Month 1 (first 15 days)
	Develop job descriptions and publish position announcements for project coordinators at College 1 and College 2.	Job descriptions from a Common core project Coordinator at each site; two position announcements published.	Month 1
	Hire coordinators and orient to project and tasks	Coordinators in place to lead project.	Month 1-2
	Provide to DOE the names, resumes, and job descriptions/major functions of key personnel assigned to the project.	<i>*Names and resumes of key personnel assigned to the agreement, including a description of the functions and responsibilities of each.</i>	Month 2-3
	Appoint and orient advisory committee	<i>*Advisory Committee with 2 representatives from each of the following: 1) Faculty of Teacher Ed Programs: 2) Faculty of EPI Programs 3) Administrators of faculty of a school district teacher preparation program 4) School district professional development directors 5) School-based administrators: 6) District-level administrators.</i>	Month 2-3
	Conduct orientation meeting with county level personnel identified from 20 counties	Meeting agenda and training materials	Month 1-2

Sample Project Timeline 1

Appendix C  
Sample Timelines

<b>Phase 2: Design Professional Development Module for Teacher Standards Tool</b>	Project Coordinator establishes contacts with key personnel at College 2 and makes plans for initial training on the functions of the teacher Standards tool	Minutes of meetings; contact information and other documents.	Month 1-2
	Schedule group meetings for orientation/demonstration for College 1 and College 2 Teacher Education Department personnel by ... personnel about the background and purpose of the teacher standards tool.	Agenda and/or orientation and training materials provided by .... And/or college 1 and college 2.	Months 2-3
	Purchase training materials/supplies and training devices (technology) as required to implement the comprehensive work plan.	All materials/supplies and training devices ordered, delivered, inventoried, and stored for use. Purchase orders, check requests, inventory records, etc., on file.	Months 2-3
	Identify and contract with professional educators to develop training materials for target population on purpose and functions of Teacher Standards Tool. <ul style="list-style-type: none"> <li>Contract with qualified personnel in developing training materials on Teacher Standards Tool</li> <li>Conduct group meeting for orientation/demonstration for College 1 and College 2 Teacher Education Department personnel for ... personnel about background and purpose of the Teacher Standards Tool.</li> <li>Assign tasks and establish timelines/deadlines;</li> <li>Conduct collaborative workshops as required for the completion of the training resources.</li> </ul>	Signed contracts with professional educators; training/meeting schedule and materials.	Months 4-7
	ment modules to introduce target populations to rds Tool. for participants in face-to-face sessions and/or tion of the module and participant learning gains	First versions of Tool #1 modules developed and delivered.  <i>*Evaluation/assessment instruments to ascertain participant learning gains as a result of the professional development.</i>	Month 4-12
	Create training toolkits for use in professional development on the Teacher Standards Tool.	First versions of all training materials for Teacher Standards Tool loaded on ipad or notebook computer for pilot test.	Months 4-12
	Pilot test all training materials with EPI classroom teachers and pre-service teacher candidates. <ul style="list-style-type: none"> <li>Engage in a pilot test EPI classroom teachers and pre-service teacher candidates at college 1 and college 2.</li> <li>Receive feedback.</li> <li>Revise as required.</li> </ul>	Schedule of pilot tests; feedback from pilot test; revised versions of training toolkits.  Sign – in sheets and participant evaluations.	Months 6-12

## Appendix C

### Sample Timelines

### Sample Project Timeline 2:

[illegible]

## Appendix C

### Sample Timelines


#### Sample Project Timeline 3:

Table 2.0 Project Timeline			
	State Goal	Objective	Strategies/Activities
Remainder of Fall 2012	Promote higher education faculty and secondary education teacher collaboration for standards and curricular alignment.	1. Promote College 2 faculty and OK County and WA County secondary teacher collaboration for standards and curricular alignment.	Establish curriculum alignment teams.
Remainder of Fall 2012 and early Spring 2013	Build and strengthen connections between College 2 and their respective school districts.	2. Build and strengthen connections between College 1 and Ok and WA counties school districts.	<ul style="list-style-type: none"> <li>• Host working groups to align curriculum</li> <li>• Plan workshops and create materials.</li> </ul>
Spring 2013	Increase college readiness of high school graduates through enhanced curricular alignment.	3. Increase OK and WA Counties high school graduate's college readiness through enhanced curricular alignment. 4. Increase pre-service teacher's awareness of Ok and WA. 5. Increase secondary teachers' awareness of the OK and WA.	<ul style="list-style-type: none"> <li>• Host workshops on the Ok and WA for both county school districts; invite pre-school districts; invite preservice teachers in college 1's Teacher Education programs.</li> <li>• Provide materials for classroom instruction related to the CCSS.</li> </ul>
Spring 2013	Increase higher education faculty's knowledge of OK and WA.	6. Increase college 2 faculty's knowledge of ccss and parcc.	Offer workshops on ccss and parcc for college 1 faulty across disciplines and programs.
Summer 2013		7. Report findings to division of state colleges. 8. Create project website 9. Attend 2013 connections conference and present finding.	<ul style="list-style-type: none"> <li>• Evaluate project effectiveness</li> <li>• Disseminate information.</li> </ul>



Appendix D  
Datatel Approval Form

Request for Datatel Access Form:

 <b>Colleague/Datatel Form</b>	
Information Technology Services (409) 933-8302 <i>Submit completed forms to Information Technology Services via email at helpdesk@com.edu</i> <b>** Please allow 72 hours for processing after an IT Ticket has been created **</b>	
Employee Name:	Datatel ID.:
Account: <input type="radio"/> New User <input type="radio"/> Update User <input type="radio"/> Disable User Account: Date _____ Time: _____	
Job Title Change:	Department Change:
<b>ADD OR REMOVE DATATEL COLLEAGUE ACCESS</b>	
Datatel Colleague Account: <input type="radio"/> Add Access <input type="radio"/> Remove Access	
Modules Requested : <input type="checkbox"/> TEST <input type="checkbox"/> PRODUCTION (default)	Informer : <input type="checkbox"/> Power User <input type="checkbox"/> Launcher (default)
Screen / Mnemonic(s) : (Inquiry access will be given unless specified below)	
<b>CF Access</b>	
<input type="checkbox"/> View/Print Budgets (GL_REP) <input type="checkbox"/> Requisition/Vendor Inquiry (CF.INQ) <input type="checkbox"/> GL Approver (GL.APRV) <input type="checkbox"/> GL Account Inquiry (GL_INQ) <input type="checkbox"/> Create Requisition (CF.REQ)	
Budgets Requested: (enter GL#)	
<b>APPROVAL</b>	
Supervisor Signature	Date _____
<b>DATATEL COLLEAGUE APPROVAL</b>	
CF Mnemonic Approval (If required): (Controller)	Date _____
ST Mnemonic Approval (If required): (Student Information – Registrar)	Date _____
ST Mnemonic Approval (If required): (Financial Aid– Director of Financial Aid)	Date _____
HR Mnemonic Approval (If required): (Director of Human Resources)	Date _____
CA Mnemonic Approval (If required): (VP of Institutional Advancement)	Date _____
<b>Information Technology Use Only</b>	
Helpdesk Ticket #:	Date Received _____
Completed by:	Date Completed _____

**College of the Mainland**  
**Statement of Time & Effort**

Employee Name: \_\_\_\_\_ ID#: \_\_\_\_\_

Supervisor Name: \_\_\_\_\_ Phone #: \_\_\_\_\_

Period Beginning Date: \_\_\_\_\_

Period Ending Date: \_\_\_\_\_

Grant Name: \_\_\_\_\_

Percent time employed by grant: \_\_\_\_\_

I verify that for the period listed above 100% of my time and effort as an employee of College of the Mainland was dedicated to the grant referenced above.

Signed: \_\_\_\_\_ Date: \_\_\_\_\_

Supervisor: \_\_\_\_\_ Date: \_\_\_\_\_

Time & Effort reports must be sent to the Grants Office where there are retained for a period of five (5) years past the date of the grant closing report submission for all full-time personnel working 100% of their time on any grant.

## Interviewing Do's and Don'ts

### Do

- Prepare for the interview by carefully examining the job description and the applicant's resume and/or application
- Familiarize yourself with EEO, non-discriminatory selection practices. Resist personal biases and reject assumptions.
- Follow a written, structured interview and question format.
- Think of the candidate as a College of the Mainland guest; make him/her feel welcome and respected; treat him/her with courtesy and dignity.
- Inform the candidate that you always take notes which helps remind you of the conversation.
- Ask open-ended questions
- Let the applicant do most of that talking. Listen attentively. Allow pause/silence.
- Encourage applicant to ask questions about the job and/or the organization.

### Don't

- Make you initial review of the candidate's application/resume when she/is sitting in front of you.
- Ask questions that do not related to the candidate's ability to do the job.
- Shoot from the hip, thinking up questions as you speak with each candidate.
- Forget to shake hands; overlook introducing yourself.
- Just start writing without forewarning the candidate.
- Accept incomplete or vague answers.
- Monopolize the conversations; get distracted while the applicant is speaking; rush.
- Forget the candidate is also studying you.

### **Tips for Interviewing Applicants with Disabilities**

1. Always offer to shake hands. Do not avoid eye contact, but don't stare either.
2. Treat the applicant as you would any other adult – don't be patronizing. If you don't usually address applicants by their first names, don't make an exception for applicants with disabilities.
3. If you feel it appropriate, offer the applicant assistance (for example, if an individual with poor grasping ability has trouble opening a door), but don't assume it will necessarily be accepted. Don't automatically give assistance without asking first.
4. If you know in advance that an applicant has a particular disability, try to get some information (from local and/or national organizations) before the interview on how the limitations of the disability may affect the performance of the essential functions of the job in question.
5. Whenever possible, let the applicant visit the actual work station.

## **Sample Interview Questions**

The following tips are provided to help with the interview process:

All committee members should be reminded about bias and the dangers of stereotyping. Group interviews followed by discussion can be a positive situation – groups are thought to self-correct the biases of individual members.

Every interview group needs a facilitator to keep the process on track. During group questioning, if the candidate isn't doing 75-80% of the talking, something is wrong that the facilitator needs to correct. The first skill of all interviewers is to listen.

### **Sample Interview Questions**

These are suggestions-tailor your questions toward specific jobs.

#### **Managerial/Supervisory Positions**

1. What would you say are some of your more important accomplishments? Considering these accomplishments, what are some of the reasons for your success?
2. What responsibilities or results have not come up to your expectations?
3. How many immediate subordinates have you selected in the last two years? Any surprises or disappointments?
4. How many immediate subordinates have you removed from their jobs in the last few years?
5. What has been the biggest surprise you have received from something getting out of control? What did it happen?
6. Let's talk about standards of performance. How would you describe your own? What would your subordinates say? What would your boss say?
7. What things do you think contribute to your effectiveness as a supervisor?
8. How would you describe your relationship with your supervisor?
9. Most of us can look back upon a new idea, a new project, or an innovation we feel proud of introducing. Would you describe one or two such innovations that you are particularly proud of?
10. Are there any conditions or restrictions that would limit your flexibility for taking on this new assignment?
11. Do you have any questions?

#### **Faculty Positions**

1. How do you motivate students?
2. How do you create a climate conducive to learning?
3. How do you update your knowledge, professional skills and resources to make your instruction meaningful?
4. How do you meet or support the individual learning needs of students?

Appendix H  
Sample Interview Questions

5. What information do you have that shows your students' achievement or the effectiveness of your service?
6. What professional goals have you set for yourself, and what progress have you made toward attaining them?
7. How do you assess student learning, and what is your justification for these approaches?
8. What do you consider the key elements of successful course design?
9. Describe your favorite assignment and explain the educational rationale behind it.
10. What is the most influential source you have read on teaching and/or learning?
11. How do (or would) you deal with classrooms where students typically fall into one or two groups: those very well prepared or those hardly prepared at all?
12. How do you promote academic integrity in your course?
13. If you meet a student five years after that student has taken your course, what would you like that student to remember about your course? Can identify some specific aspects of your instruction that help to endure this is what a student remembers?
14. Do you have any questions?

**Non-Supervisory Positions**

1. Why do you think you might like to work for our college?
2. What are your future career plans?
3. What personal characteristics are necessary for success in your field?
4. What qualifications do you have that make you think you will be successful in your field?
5. What jobs have you enjoyed the most? The least? Why?
6. What have you done that show initiative and willingness to work?
7. Why are you leaving your current position?
8. Why should I hire you?
9. How would your co-workers describe you? Your supervisors describe you?
10. Describe your greatest accomplishment so far?
11. Do you have an analytical mind or a creative mind?
12. Do you have any questions?

**College of the Mainland**  
**Grants Conflict of Interest Statement**

College of the Mainland defines conflict of interest as a situation in which a person may derive personal benefit or provide benefit to family and friends from his/her actions and decisions as a grant/College employee. Such dualities of interest must be fully disclosed to one's supervisor, and the employee must not be involved in any decisions in which there could be a conflict of interest.

In my position:

\_\_\_\_\_ I have no conflicts of interest.

\_\_\_\_\_ I will fully disclose to my supervisor any future conflicts of interest.

**OR**

\_\_\_\_\_ I have a potential conflict of interest, as described below.

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Employee Signature \_\_\_\_\_

Date \_\_\_\_\_

Supervisor Signature \_\_\_\_\_

Date \_\_\_\_\_

This statement complies with C.F.R. 200.112: The Federal awarding agency must establish conflict of interest policies for Federal awards. The non-Federal entity must disclose in writing any potential conflict of interest to the Federal awarding agency or pass-through entity in accordance with applicable Federal agency policy.