GRANT MANAGEMENT
Handbook

NORTHEAST STATE

We're here to get you there

Revised
August 2024

TABLE OF CONTENTS

SECTION 1: GETTING STARTED

1A: Execution of Award Documents & Assignment of Grant Fund Numbers in Banner

Generally speaking, written notices of grant awards will be delivered to the Office of Sponsored Programs, either directly from the funding agency or via the Office of the President.

The Office of Sponsored Programs is responsible for reviewing the award documents; ensuring that the documents are appropriately executed; distributing copies in the manner required by the funding agency; and addressing any requirements/conditions of the grant award.

At minimum, a copy of the award packet is sent to the Project Director and the Grant Manager (in the Office of Finance). The Office of Sponsored Programs also retains a copy for the College's central grant files. Electronic copies are generally preferred for internal distribution.

If the award amount is different than the amount that was requested in the grant application, the funding agency will require the College to submit a revised grant budget. The Director of Sponsored Programs and Strategic Initiatives, in coordination with the Grant Manager and the Project Director, will oversee the preparation and submission of the revised grant budget in accordance with funding agency requirements.

> If the Project Director receives notice of a grant award directly from a funding agency, it is essential that he or she consult with the Office of Sponsored Programs immediately to ensure that the project is initiated in accordance with required procedures.

The Office of Sponsored Programs will oversee the execution of award documents, as described above, and guide the Project Director through project start-up. It is essential that project start-up activities be completed in a timely manner to avoid delays in project implementation that might threaten the College's ability to meet stated project objectives.

The Office of Sponsored Programs will send a copy of the award notice, executed award agreement, and final grant budget to the College's Grants Manager, with a request to set up the new Fund, Organization, and Program codes in the College's accounting system of record. This FOAP (Fund, Org, Account, Program) must be used for all grant-related expenditures. The Project Director CANNOT begin spending grant funds until the FOAP is established in Banner.

Copies of all award documents will be retained by Office of Sponsored Programs for the College's central grant files, and by the Project Director for ongoing project management purposes.

Depending on the funding agency, it may be necessary to account for grant-funded scholarships separately from other expenditures. In such cases, an additional Detail Code must be established in Banner for this purpose. During his/her initial review of the grant documents, the Project Director should note whether the grant will fund scholarships or other aid to students and consult with the Grants Manager during project start-up to determine whether a Detail Code is needed.

1B: Project Director Responsibilities

It is STRONGLY suggested that the Project Director begin by reading the original solicitation for grant proposals, sometimes called an RFP (Request for Proposals) or NOFO (Notice of Funding Opportunity). This document summarizes the funding agency's rationale, priorities, and guidelines for the grant program.

> **<u>Step 1: READ!!</u>**
>
> Project Directors are expected to read the RFP, the application, and all award documents thoroughly!

It is also the Project Director's responsibility to read all grant application and award documents thoroughly, paying particular attention to terms and conditions of the award; project objectives, benchmarks, and timelines; reporting requirements; and potential conflicts between the project timeline and the academic calendar. <u>The Project Director will be responsible for following through on the commitments outlined in the application and award documents, and should invest time at the outset to familiarize him or herself with these commitments and plan accordingly.</u>

This handbook is designed to provide project directors with a summary of typical grant administration processes and potential pitfalls. It **IS NOT** exhaustive. Guidelines for particular funding agencies or particular grant programs may be different and it is the Project Director's responsibility to understand all pertinent requirements for his/her grant.

Upon notice of award, and prior to project implementation, Project Directors must review and submit an acknowledgement that they understand NeSCC's Grant Responsibilities Matrix (see Appendices), which includes a list of project director responsibilities. The acknowledgement is submitted electronically via the College's grant management software.

Project Directors must also review and submit a Conflict of Interest Statement electronically via the College's grant management software (see Appendices).

1C: Post Award Orientation

The Office of Sponsored Programs will schedule a Post Award Orientation meeting to include the Project Director, the Grants Manager, and other key staff members with grant-related responsibilities. For instance, if the grant includes funding for scholarships, representatives from the Financial Aid Office will be asked to participate.

> **<u>What's in a name?</u>**
>
> Post Award Orientation is a good time to ensure that all parties refer to the project by the same name, to avoid confusion during the project period.

The meeting agenda will include:

- an overview of the project, (including goals and objectives);

- a review of the grant budget (including any necessary revisions);
- confirmation of roles and responsibilities (including job descriptions for grant-funded personnel);
- a review of the evaluation plan (if any); and
- a discussion of grant record-keeping and reporting requirements.

If the Project Director is not familiar with Banner, he or she should arrange training with the Grants Manager at this time.

1D: Hiring New Grant-Funded Personnel

If new positions are created as a result of a grant, it is critical that the hiring process begin as quickly as possible to prevent significant delays in project implementation. The hiring process will be conducted according to the Tennessee Board of Regents (TBR) and College human resource policies and procedures, regardless of funding source. For more information, consult Human Resources.

During the grant development process, the Director of Sponsored Programs and Strategic Initiatives works closely with Human Resources to classify grant-funded positions and determine salary and fringe benefit cost estimates, which are included in the grant budget. Anticipated minimum qualifications and job responsibilities are aligned with TBR and College guidelines to determine appropriate position classifications and compensation.

If a complete job description was developed during the grant writing process, it will be reviewed and confirmed during Post Award Orientation. If a complete job description has not been developed, those individuals responsible for project start-up activities (the Project Director or Director of Sponsored Programs and Strategic Initiatives) will be required to develop a job description in accordance with established Human Resource guidelines.

Once the job description is approved by appropriate College administrators (those who will serve in supervisory roles to the proposed position, up to Vice President), the Project Director (or the Director of Sponsored Programs and Strategic Initiatives if the Project Director is yet to be hired) will work with the appropriate supervisor and Human Resources to complete all required personnel requisition forms and advertise the position.

Fiscal Year vs. Grant Year

Budget conflicts may arise when the grant funding period does not sync with the College fiscal year.

The grant period may not correspond with the College's fiscal year, academic year, or standard faculty contract periods. The Project Director must review all grant-funded positions with Human Resources to identify any potential conflicts in the funding timeline, including the projected end date, and develop strategies to address them. All grant-funded positions are subject to the conditions of the grant, and no guarantee of employment can be given beyond the grant period.

1E: Scholarships & Financial Aid

If the grant budget includes scholarships or any other form of direct aid to students, the Financial Aid Director will be included in the Post Award Orientation to establish procedures for the administration of the grant-funded aid. Common considerations include:

- eligibility criteria for grant-funded awards;
- funding agency limitations (tuition only, fees, books, other costs of attendance, no refunds to students, etc.);
- timing of awards (ensuring that students are not dropped from classes while grant-funded aid is pending); and
- impact of grant-funded aid on other sources of financial aid (avoid offsetting federal aid, etc.).

Accounting for Grant-Funded Scholarships

Depending on the funding agency, it may be necessary to account for grant-funded scholarships separately from other expenditures. In such cases, an additional Detail Code must be established in Banner for this purpose. During his/her initial review of the grant documents, the Project Director should note whether the grant will fund scholarships or other aid to students and consult with the Grants Manager during project start-up to determine whether a Detail Code is needed.

1F: Partners, Contracts, and Sub-Awards

If third parties are to receive funding under the grant, a subcontract agreement, memorandum of understanding (MOU), or other partnership agreement should be executed. At minimum, a partnership agreement (contract, MOU, etc.) should outline the expected tasks, period of performance, benchmarks, amount of funding allocated to the partner, and any other requirements (reporting periods, invoicing schedules, etc.). A budget should be attached outlining how the partner plans to spend grant funds.

Generally, the lead institution on the grant is responsible for drafting the agreement. In some cases, a draft agreement may have been included in the grant application. If so, that agreement will need to be reviewed, updated, and executed during project start-up. If a draft agreement was not submitted with the grant application, the Project Director should work with the Director of Sponsored Programs and Strategic Initiatives and the Purchasing Coordinator to draft an agreement that complies with College policies. All agreements must be reviewed by the Purchasing Coordinator and/or TBR Legal prior to execution.

Partner agreements will require the signature of authorized officials of the College and the partner agency(ies). Project Directors should be aware that this process can take a substantial amount of time. The Director of Sponsored Programs and Strategic Initiatives is available to help facilitate the execution of partner agreements, as needed.

1G: Initiating the Program Evaluation

Increasingly, grant funding agencies are requiring grantees to conduct program evaluations to document program impacts and identify best practices for potential replication. Depending on the size and scope of the project, the complexity of the evaluation plan, and funding agency requirements, the evaluation may be conducted using existing internal resources (the Office of Research, Analytics & Planning, Banner, etc.), or by contracting with an external evaluation firm.

In many cases, a preliminary evaluation plan will be developed and submitted with a grant application. This plan will typically include a description of what will be evaluated, when and by whom, the data collection instruments to be used, and how the data will be used to determine the project's level of success. Establishing a solid and detailed evaluation plan at the outset of the grant period increases the likelihood of a successful evaluation.

Internal Evaluation - If a preliminary evaluation plan was submitted with the grant application, it will be reviewed and finalized during Post Award Orientation.

If a preliminary plan has not been developed, the Project Director must review the objectives, activities, and outcomes outlined in the grant proposal; develop a preliminary list of baseline data needed; and identify possible data collection and assessment instruments that might be needed to measure different aspects of the project. These elements should be used to construct a clear evaluation plan for the project. The College's Assistant Vice President for Research, Analytics & Planning can advise the Project Director on appropriate research methods; the identification of existing measurement or assessment processes that might be applicable to the project; and the development of new data collection instruments.

The Project Director is responsible for monitoring the execution of the evaluation plan throughout the grant period.

External Evaluation – Northeast State Community College has developed a pool of pre-screened, pre-qualified external evaluators for use in grant-funded programs. As a result, individual Project Directors are not required to issue competitive requests for proposals (RFPs) or invitations for bid (IFBs) to contract with an external provider for evaluation services. The Project Director may request quotes from a selection of qualified firms within the pre-qualified pool. Sponsored Programs staff are available to assist with the procurement process for pre-qualified evaluators.

In some cases, the external evaluator may have been identified during the grant writing process, and may have been involved in the development of the preliminary evaluation plan. If the evaluator was not involved in drafting the preliminary evaluation plan, the external evaluator's work should begin with a review of the evaluation plan to ensure research validity and rigor.

If, for whatever reason, the Project Director does not wish select an evaluator from the pre-qualified pool, he or she has the option to conduct a traditional competitive bid process. For guidance on this process, contact the College's Purchasing Coordinator.

Institutional Review Board (IRB) – Institutional Review Boards review human subject research proposals to ensure that the rights and welfare of human subjects are protected by minimizing risks and ensuring informed and voluntary participation in all research studies.

If a grant project includes a program evaluation, the evaluation plan may qualify as "human subject research," necessitating an IRB review. For projects requiring IRB review, no data collection may begin until the IRB review is complete. For guidance on whether a project requires IRB review, contact the Assistant Director of Sponsored Programs or the Assistant Vice President for Research, Analytics and Planning.

It is the responsibility of Northeast State's federally-registered Institutional Review Board to review human subject research proposals, including those associated with grant-funded projects. **The Project Director is responsible for submitting project evaluation plans for IRB review before initiating research or data collection.** For guidance on how to initiate the IRB review process, contact the Assistant Director of Sponsored Programs or the Assistant Vice President for Research, Analytics and Planning.

Section 2: Implementing the Project

2A. Spending Grant Funds

One of the Project Director's most important responsibilities is to manage the project budget within the limits of the terms of the grant. Careful and realistic construction of the budget during proposal development should mean that grant funding will be sufficient to cover anticipated project costs. The proposal budget serves as the Project Director's initial spending plan.

It is the Project Director's responsibility to monitor and authorize all project expenditures and to make certain that all funds are expended in accordance with the approved budget and the grant timeline, before the grant expires. The person responsible for managing the budget for the project, typically the Project Director, is given access to the College's finance system (Banner) so that he or she may monitor the budget and expenses of a grant project on a regular basis (at least monthly). The Grants Manager will provide one-on-one training in Banner, as needed.

Grant Codes

All paperwork for grant expenditures MUST include the assigned Banner FOAP codes. Project Directors should make every effort to avoid charges to incorrect accounts, as after-the-fact adjustments do not provide a clean audit trail.

It is STRONGLY recommended that Project Directors maintain their own Excel spreadsheet for budget management purposes, regularly reconciling expenses and balances against those shown in Banner. The Grants Manager will also provide expense spreadsheets, as requested by the Project Director.

Expenditures should be reviewed at least on a monthly basis, with more comprehensive reviews at the midpoint and three-quarter points of the budget period. The Project Director should develop revised spending plans and submit any necessary budget modifications using the Request for Grant Modification Form to ensure timely expenditure of funds (see Appendices).

Modification forms must be approved by the following personnel before they can be submitted to the funding agency:

- Grants Manager (Finance)
- Director of Sponsored Programs and Strategic Initiatives
- Supervising Vice President
- President

Every effort should be made to expend all budgeted grant funds within each grant year. Depending on the funding agency, no-cost extensions or carry-overs of unobligated funds into a new grant year may or may not be allowed. Project Directors should evaluate the grant budget and expenditures at least 90 days prior to the end of the grant year. If it is determined that the project is at risk of having unobligated funds at year-end, the Project Director should consult with his or her supervisor, the Grants Manager, the Director of Sponsored Programs and Strategic Initiatives, and the funding agency Program Officer as soon as possible to ensure that there is ample opportunity to expend available funds, or to submit documentation for a no-cost extension or carry-over.

NON-SUPPLANT REQUIREMENTS

Most government grants require that the College certify that grant funds will not be used to supplant or replace funds normally available to the College for its operating expenses. For this reason, grant dollars are maintained under unique FOAPs in Banner and all expenditures are scrutinized individually to make certain that they are part of the approved grant budget.

Procurement

NeSCC policy (04:06:00 College Requisition for Purchase/Purchase Orders) states that all purchases shall be made by requisition or purchase order. Project Directors should monitor grant expenditures in Banner on a regular basis to ensure sound financial management, and should coordinate with the Finance Office to ensure timely payment of vendor invoices. If a Project Director is not familiar with Banner, he or she should make arrangements to obtain training from Business Office staff as soon as possible.

The Project Director is responsible for reviewing funding agency guidelines for allowable/unallowable expenses prior to making any purchase. The approved project budget is not the Project Director's only reference when it comes to grant expenditures. Guidance issued by the federal Office of Management and Budget (OMB) (2 CFR 200 or "Uniform Guidance") and funding agency regulations establish additional cost principles and restrictions with which Project Directors must comply. Alcohol, for example, is an unallowable expense for most funding agencies, and food may only be allowable under particular circumstances.

Most grants are administered on a reimbursement basis. This means that the College pays expenditures up-front, and requests reimbursement from the funding agency. It is important that sufficient documentation be kept for grant-funded purchases, so the College can provide appropriate justification for reimbursement. In most cases, the Grants Manager will submit reimbursement requests to the funding agency, but it is the Project Director's responsibility to coordinate with the Grants Manager to ensure the accuracy of all financial reporting to the funding agency.

Please note that there are specific procurement guidelines for purchases above and below certain defined cost thresholds. Please contact the Finance Office for guidance.

Requisitions

Expenditures for equipment, supplies, and services are initiated through Banner. Purchases made through Banner are approved electronically.

When obtaining quotes from vendors for any purchase requests, it must be stressed that the final authorization to purchase is with a Northeast State Community College Purchase Order, which is faxed or transmitted electronically to the vendor. The quote obtained by the Project Director is an estimate for encumbering funds only.

Special Statement on Purchase Orders

Project Directors should never instruct a supplier to deliver goods or begin services until an authorized Purchase Order is issued. Any such instructions to a supplier may become the **personal financial liability of the requesting individual.** Ultimately, the Business Office makes final purchasing decisions based on overall requirements, regulations, and mandates of the College.

State Contract Purchasing

NeSCC is a state agency. Therefore, TBR encourages the College to utilize state contracts to obtain the best pricing for office supplies, furniture, computers, etc. Contact the College's Purchasing Coordinator to determine whether purchases planned for a particular grant are impacted by these guidelines.

Sole Source Procurements

Sole source procurements are made when only one source is available for the goods or services required. Competition is not available in a sole source situation. This differs from a proprietary purchase, where the product is manufactured by only one company but is sold through multiple distributors, so competitive pricing can be obtained.

Receipt of Invoice

Invoices should be submitted directly to Accounts Payable for payment as stated in NeSCC's College Requisition for Purchase/Purchase Orders Policy (04:06:00). The Terms and Conditions provided with each purchase order indicates invoices should be sent to Accounts Payable. It is recommended that the Project Director request a copy of the invoice from the Finance Office to reconcile the invoice amount with the corresponding purchase order. If the final amount of the purchase is greater or less than anticipated, the Project Director should adjust his or her own budget management spreadsheet accordingly.

In some cases, a vendor or contractor may submit an invoice to the Project Director directly. In these cases, the Project Director should keep a copy of the invoice for reconciliation against the corresponding purchase order, sign and write "OK to pay," and forward the original to Accounts Payable promptly for payment. To ensure accurate processing of the payment, the Project

Director should also indicate the project name or Requisition/Purchase Order for easy reference.

<u>Encumbrances</u>

As a part of the regular budget reconciliation process, Project Directors should work with the Finance Office to clear any remaining encumbrances on their grant. Failure to do so could result in budget restrictions for future purchases.

<u>60 Days Prior to Close of Grant Year</u>

It is important to remember that all outstanding purchase orders must clear before the grant year closes. To ensure compliance with this requirement, the Project Director should begin implementing a plan for closing the grant year at least 60 days before the official end date of the grant year.

Purchasing looks at outstanding purchase orders throughout the fiscal year. Purchasing reaches out to the initiator of outstanding purchase orders to see if they have received the requested goods/services. If not, purchasing calls the vendor to obtain the delivery status. Project directors are encouraged to work with Purchasing 60-90 days before the grant closes to see if any items relating to the grant are on the open encumbrance list.

<u>Inventory Requirements</u>

NeSCC Equipment Inventory Control Policy (04:20:00) requires that sensitive minor equipment, such as computers, laptops, printers, etc. are tagged and tracked. The Project Director should keep an inventory of grant-funded equipment.

<u>NeSCC policy requires that supplies or equipment with a unit cost of $5,000 or more must be recorded as a fixed asset and tracked using standard inventory procedures. This process is coordinated through the Finance Office.</u>

Expenditure Categories

<u>Personnel Expenses</u>

As mentioned in Section 1 of this handbook, personnel expenditures are initiated through Human Resources. If existing College personnel are to be paid with grant funds, the Project Director should coordinate with Human Resources and Payroll to ensure that the appropriate portion of salary/wages and benefits are charged to the grant FOAP.

Any College personnel being paid with grant funds, or contributing their time to a grant-funded project as in-kind match, will be required to complete and submit monthly Time and Effort reports, in accordance with college policy, for documentation purposes.

Project Directors should monitor Banner regularly to ensure that personnel expenses are being applied to the grant FOAP according to the project budget. If personnel expenses in Banner are higher or lower than expected, the Project Director should contact Human Resources immediately to verify that salary and benefit costs are being allocated properly.

Fringe Benefits

Fringe benefits for full time positions (faculty, administrators, or classified staff) typically include social security (FICA), state retirement benefits, group life insurance, worker's compensation, cash match, and health insurance.

Part time positions (adjunct faculty or hourly/wage) are limited to 29 hours per week, not to exceed 120 hours worked in a pay period. Fringe benefits for these positions are typically limited to social security (FICA).

Travel

Paperwork for all grant-funded travel should be processed in accordance with College Policy (04:23:00 General Travel Policies and Procedures) and TBR Policy (4.03.03.00 General Travel), and State of Tennessee travel guidelines. Travel paperwork should be processed using existing procedures within the traveler's own department. Prior to traveling, an employee, or the appropriate administrative assistant, is expected to complete an Authorization for Official Travel form; obtain approval from his/her supervisor, Dean, or Vice President; and forward the form to the Accounts Payable for approval.

Additional requirements for grant-funded travel include coordination (in advance) with the Project Director to confirm that funds are available to cover the travel, and to ensure that the appropriate grant FOAP is included on the travel paperwork. A copy of the Authorization for Official Travel form should also be submitted to the Project Director when it is submitted to Accounts Payable for processing.

According to College policy (04:23:00), after traveling, an employee must complete a Claim for Traveling Expenses form; obtain approval from his/her supervisor, Dean or Vice President; and forward it to Accounts Payable, along with pertinent receipts, for payment via direct deposit. The same grant FOAP should be entered on both the travel authorization form and claim form. A copy should also be submitted to the Project Director.

It is the Project Director's responsibility to ensure that travel paperwork is completed accurately and in a timely manner. Per TBR policy (4.03.03.00) travel claims must be filed within 45 days of the completion of travel. Travel claims submitted beyond 45 days would require an exception to policy memo approved by the President for payment to be made. Accounts Payable staff is available to provide technical assistance regarding travel regulations and associated paperwork.

Equipment Purchases

NeSCC follows state guidelines for equipment purchases. The Project Director is responsible for verifying that sufficient funds are available for equipment purchases in the grant budget; completing all necessary purchasing paperwork, with the guidance of Purchasing Coordinator; and ensuring that all purchasing paperwork includes the appropriate grant FOAP. If the equipment is IT related, the Project Director should contact NeSSC's Office of Information Technology, which will facilitate the purchasing process to ensure that all hardware and software meet appropriate compatibility and security standards.

Some funding agencies, like the U.S. Department of Labor, require prior approval from the Program Officer for equipment purchases, even if the item was included in the approved grant budget. These and other restrictions will be outlined in the terms of the grant. If there is any question, the Project Director is encouraged to seek guidance from the funding agency program officer, NeSCC's Director of Sponsored Programs and Strategic Initiatives, or the Finance Office.

Supplies: Promotional Items & Marketing

Project Directors are encouraged to review funding agency guidelines and/or consult with Program Officers before expending grant funds on promotional items or marketing-related expenses. Some funding agencies, including federal agencies, disallow advertising costs. Any costs of this sort should be considered carefully.

Supplies: Computer Hardware or Software

Project Directors must abide by NeSCC's Information Technology purchasing requirements for computer hardware or software to ensure compatibility with, and avoid duplication of, current College equipment and systems.

Project directors must consult with the Assistant Director of Client Services to discuss the hardware/software being considered for purchase and to request a quote. Once a quote is secured, the Project Director must complete and submit a "Hardware/Software Pre-Purchase Review" request, located on the Northeast State Forms webpage. This IT review must be completed before the purchase can proceed.

Scholarships

If a grant includes scholarship assistance for students, it is essential that the Project Director coordinate with the Financial Aid office. At the outset of the project, processes and procedures for administering scholarships need to be established based on the scholarship criteria set forth in the grant application (eligibility criteria, maximum award amounts, etc.).

Sub-recipients, Consultants, & Contractors

Some grant budgets include funds for the purchase of sub-recipient services, contracted services, and/or consultant services. For example, contracts may be needed to purchase services from a vendor, or grant funds may be shared with a partner organization to perform particular tasks associated with the project. Consultants may be needed to serve as external evaluators or content experts.

Following the Post Award Orientation, the Project Director will work with the Office of Sponsored Programs and/or Purchasing to draft sub-recipient agreements or contracts, as needed. At minimum, agreements should address expected tasks, period of performance, benchmarks, budget, reporting, and recordkeeping. The Project Director is responsible for working with the Purchasing Coordinator to ensure that contracts and agreements are developed, approved, and executed in accordance with established contracting policies and procedures.

Copies of all executed partnership agreements (MOUs, Contracts, Sub-recipient agreements, etc.) must be distributed to the Office of Sponsored Programs. The Project Director should retain a copy and submit the original document to the Purchasing Coordinator. **Grant Project Directors are not authorized to sign contracts, grants, or other agreements without written delegation of authority from the College President.**

The Project Director is responsible for establishing sub-recipient monitoring processes and procedures in accordance with federal regulations and funding agency requirements. For additional guidance on these requirements, contact the Office of Sponsored Programs and/or the funding agency Program Officer.

Printing & Design Services

The majority of printing on campus is completed by NeSCC's own Print Shop. This internal resource should be used whenever possible. If printing and design services must be outsourced, state procurement regulations apply. Contact the Print Shop for more information.

The Director of Marketing and Community Relations oversees the production of all internal and external publications. Project Directors who plan to expend grant funds for designing and printing new publications (brochures, mailers, etc., as opposed to basic printing and duplication) must consult Marketing as early as possible in the grant period and avoid last minute requests.

2B. Supervisory Responsibilities

If the Project Director supervises other employees, he or she will be responsible for complying with established College policies and procedures for supervisory roles. These responsibilities may include, but are not limited to, completion of regular performance evaluations, approving timesheets, and overseeing time and effort reporting.

2C. Publicity & Marketing

A new grant award is, oftentimes, a newsworthy event. If it is anticipated that a public announcement of the grant award is warranted, or the project implementation plan calls for any type of marketing activity, the College's Director of Marketing and Community Relations should be included in the Post Award Orientation. They are responsible for coordinating all publicity for the College, and are available to assist Project Directors with the development of press releases, scheduling press events, and implementation of other marketing and communication strategies.

<u>If the Project Director is contacted directly by the media, he or she should contact the Director of Marketing and Community Relations prior to sharing information about the project with the public.</u> If the Project Director receives a request for a copy of the grant proposal or other grant-related documentation, the request should be referred to the Director of Sponsored Programs and Strategic Initiatives.

2D. Modifications/Amendments

Even though the project work plan and budget were carefully constructed when the proposal was developed, modifications may be necessary to address changing needs or circumstances.

An official change to the project work plan or budget is typically called a modification or an amendment, depending on the funding agency. In some cases, it is advisable for the Project Director to contact the funding agency Program Officer to discuss the circumstances surrounding the change and obtain guidance on the preferred process and format for modification requests. <u>However, the Project Director must complete NeSCC's internal Request for Grant Modification approval process before a formal modification or amendment is requested from the funding agency.</u>

Some circumstances that may require a change in spending plans include: (1) grant-funded personnel starting work later in the budget year than anticipated, resulting in excess personnel and fringe benefit funds; (2) state-mandated salary increases are higher than anticipated; (3) a grant-funded employee selects a less expensive health insurance plan than projected; or (4) equipment bids come in lower than expected.

Some circumstances that may require an amended work plan include: (1) extension of the project performance period beyond the original end date; (2) changes in the scope of work; or (3) changes in key project personnel.

Modifications/amendments are not officially approved until a written response is received from the funding agency. Purchases or other transactions that are dependent upon approval of the modification or amendment should not be acted upon until official approval is received from the Program Officer. In some cases, the funding agency will issue revised award documents to reflect approved changes. <u>**The Project Director should provide copies of both the modification**</u>

request and the approval/disapproval to the Office of Sponsored Programs and the Grants Manager.

It is STRONGLY recommended that the Project Director retain copies of all correspondence with the funding agency within his/her grant files.

Special Statement on Budget Modifications

Most funding agencies allow some flexibility within individual budget categories, as long as expenditures remain consistent with stated project objectives. As a rule of thumb, a budget amendment or prior approval from a program officer is typically necessary to move funds between budget categories, or if there is a deviation of more than 10% within a single budget category. If in doubt, contact NeSCC's Office of Sponsored Programs for guidance regarding specific budget changes.

2E. Recordkeeping

Any activities undertaken during the project and all project expenditures are part of the project records. In evaluating the project, the funding agency will want to know exactly what was done, when and how it was done, and how much it cost. Accurate and complete records are absolutely necessary. These records will support the College during a monitoring visit from funding agency representatives, in the evaluation of the project, during the College's regular financial audits, or in the event of a funding agency audit.

At minimum, grant files should contain copies of the following documents:

- the approved proposal and budget;
- operational budgets and amendments;
- correspondence with the funding agency;
- time and effort documentation (discussed in more detail below);
- contracts and partnership agreements;
- progress and financial reports;
- participant records;
- program evaluation records and reports;
- documentation of expenditures (purchasing, travel, etc.)

Time & Effort Reports

College policy requires any employee whose salary is in part or entirely provided through grant funding, or whose time is being contributed as in-kind match for a grant, to submit a monthly Time and Effort Report. These reports are required to justify salary and benefit charges to grant FOAP in accordance with funding agency regulations, and are subject to audit review.

The Time and Effort Report is an after-the-fact report that outlines the allocation of an employee's job duties for the preceding month. The total time reported cannot exceed 100% of time committed. The employee and his or her supervisor sign the Time and Effort Report certifying that to the best of their knowledge the report contains an accurate reflection of the employee's time allocated to grant-related duties. The grant employee will receive an automated email reminder approximately seven days before the report is due. The signed Time and Effort report should be uploaded to the grant management software via the link in the email reminder. This enables the Office of Sponsored Programs to maintain central Time and Effort files for compliance purposes. The supervisor should also keep a copy of each report.

An employee whose time is devoted to more than one grant must complete multiple Time and Effort reports and maintain records that support the amount of time charged to each grant for which he or she worked.

<u>Matching Documentation</u>

The Project Director must maintain records documenting all cash or in-kind match for the project. In-kind matching represents the value of non-cash contributions in services or property to the project. The Time and Effort Reporting Form and a supporting time sheet or log may be used to document in-kind services of project personnel. The Project Director should keep copies for the project files and scan the original Time & Effort Forms, along with any supporting documentation, into Grant Navigator, as stated above.

<u>Audits/Program Reviews</u>

Periodically, NeSCC records can be audited by the State of Tennessee and other agencies (e.g., the Department of Education, the Internal Revenue Service, etc.). Certain funding agencies maintain the right to audit grant records. All financial records must be maintained to facilitate any audit(s) that may include a review of the grant-funded project. In the event of a funding agency audit, the Grants Manager, in coordination with the Office of Sponsored Programs, will lead efforts to prepare for and respond to audit inquiries. The Project Director must contact the Director of Sponsored Programs and Strategic Initiatives immediately upon receiving any verbal or written communication from the funding agency regarding a site visit, program review, or audit.

Audit findings can result in cost disallowances and require organizations to make repayments to the funding agency. The most common audit findings include the following: (1) lack of time and effort records to support salary and benefit costs charged to grant FOAP; (2) lack of consulting agreements and invoices to support that services were related to the award and that fees were reasonable; (3) funds were expended in unapproved cost categories or transferred between cost categories without prior written approval from the funding agency; and (4) adequate supporting documentation was not provided for claimed cost-sharing/matching. **Project Directors should assume that their project <u>WILL</u> be audited at some point, and should manage the project with these common audit issues in mind.**

Retention of Records

At minimum, retention of records for grant-funded projects must comply with TBR Records Retention Policy (1.12.01.00 Records Retention and Disposal of Records), as shown below.

Record Type & Description	Retention Period	Disposition Method
Project Records (documentation of approval, completion, and conformance with grant stipulations that are not of a fiscal nature)	5 years after grant close-out	Confidential Destruction
Grant Administration (documentation of routine administration of a grant, such as application, award information, and reports)	5 years after grant close-out	Confidential Destruction
Fiscal Records (documentation of financial administration of state and federal grant money; includes audit reports, budget revisions, expenditure reports, and receipts)	5 Years after grant close-out	Confidential Destruction
Time & Efforts Reports (documentation of time spent on grant-funded projects: logs, timesheets, etc.)	5 Years after grant close-out	Confidential Destruction
Notes, Work Papers & Technical Data (documentation of data collection for grant-funded research or program evaluation)	10 Years after grant close-out	Confidential Destruction
Final Research Reports (documentation of results of grant-funded research or program evaluation)	10 Years after grant close-out	Confidential Destruction

For federal grant projects, the retention period typically begins on the date the final expenditure report is submitted. Most federal agencies require grantees to retain records for three years from that date. If an audit, claim, litigation or other action is initiated within the three-year retention period, the records must be retained until the action is fully resolved or until the retention period ends, whichever is later. Requirements may vary slightly by funding agency. If the grant award terms and conditions stipulate a longer retention period, they must be followed. The Project Director must abide by the most stringent regulations (longest retention period) applicable to any particular project.

NeSCC's Finance Office retains all grant financial records for five years after submission of the final financial report. For consistency, NeSCC's Office of Sponsored Programs also retains grant program and administration records for five years after project close-out.

At the end of the retention period, NeSCC destroys records via approved records destruction procedures set forth by TBR. A Certificate of Records Destruction must be prepared, signed by an appropriate supervising administrator, and approved by the College's Authorized Records Officer.

If the Project Director's employment with the College ends or their position within the College changes prior to the expiration of the retention period, **all grant files must be transferred to the Office of Sponsored Programs to ensure compliance with record retention policies**.

2F. Communicating with the Funding Agency

General Information

Formal communication with the funding agency will typically consist of interim and final project reports. It is a good idea, however, to maintain open lines of communication with the program officer throughout the grant period. This can be accomplished by phone or email. Project Directors should defer to the method preferred by the program officer.

The funding agency establishes dates for when all programmatic and fiscal reports are due, and the agency is entitled to change its reporting expectations and/or process at any time during the grant period.

Who is the Program Officer?

The primary contact person at the funding agency, who is responsible for overseeing grant-funded projects and managing correspondence with grantees, is usually called the **Program Officer**. Depending on the funding agency, this individual may have other titles. In some cases, the Program Officer may only be responsible for overseeing programmatic aspects of the project, while another person (sometimes called a Grants Officer) acts as the primary contact for administrative/fiscal aspects of the project. The terms of the grant will provide specific information regarding funding agency contacts and their roles.

Site Visits

Occasionally, funding agencies will request a site visit to monitor progress toward project goals. Visits are coordinated cooperatively by the Project Director and the Office of Sponsored Programs. Working with both the Project Director and the funding agency representative, the Office of Sponsored Programs will draft an agenda identifying the various individuals and offices to be included in the site visit. This agenda is discussed with the President's staff, if the President is scheduled to meet with representatives of the funding agency.

The site visit gives the College an opportunity to share the project's progress and continued potential with the funding agency. Project directors must be prepared to address and present documentation regarding attainment of project objectives and appropriate record-keeping. The Finance Office must be prepared to present financial documentation. A successful funding agency site visit can sometimes be a requirement for continued funding in a multi-year project.

2G. Evaluation

Evaluation is an ongoing process. Project directors are responsible for monitoring progress on evaluation activities throughout the grant period and ensuring fidelity to the approved evaluation plan. The evaluation process is used to measure accomplishment of project objectives, inform project replication by others, and facilitate dissemination of best practices.

Having established accurate baseline data and data collection instruments at the beginning of the grant period makes evaluation and reporting easier for the Project Director, who must oversee the development of formative and summative evaluation reports.

Formative evaluations are designed to assess progress and identify potential or actual problem areas, and facilitate project modifications as needed throughout the grant period. Summative evaluations are completed at the conclusion of the grant period and identify the degree to which project goals were met. Depending on the funding agency, formative evaluations may be required at specified intervals throughout the grant period, or not at all. For multi-year government grants, a formative evaluation is usually submitted annually in the form of a "progress report" or "continuation application" as a requirement for continued funding in the subsequent year. Summative evaluations, or "final reports," are required of most grants.

2H. Reports

Performance or programmatic reports are the responsibility of the Project Director and should reflect progress made toward the accomplishment of project objectives. Depending on the funding agency, grant reports may be required on a monthly, quarterly, semi-annual, tri-annual, or annual basis. The Project Director is responsible for reviewing all award documentation and familiarizing themselves with grant reporting requirements at the beginning of the grant period. Project Directors should also coordinate with the Finance Office to align the submission of grant progress reports with the submission of financial reports and reimbursement requests, whenever possible.

Signatures on Reports

Grant progress reports may require the signature of an authorized official of the College. Generally, this will be the College President. Project directors should allow sufficient time prior to the report deadline to obtain the necessary signatures.

It is STRONGLY recommended that the Project Director set calendar reminders for progress and final report deadlines to facilitate compliance. Project Directors will receive an automated email reminder for these reports, similar to the time and effort process discussed in 2E, above. It is also expected that the Project Director will coordinate with all project-related personnel, Research, Analytics & Planning staff, and the external evaluator to ensure that processes and procedures are in place to gather data throughout the project that will be used to complete regular grant reports. (See Evaluation section, above.)

In some cases, a funding agency will provide a specific report form to be completed by grantees. If no specific format is provided, the Project Director should develop a report that directly addresses progress in meeting the measurable objectives that were included in the original grant proposal. Progress should be reported based on outcomes, not process. Process simply describes the activities that have taken place; outcomes focus on the measurable results of those activities. Project Directors should be prepared to address the connection between grant expenditures and specific objectives/outcomes if requested by the funding agency.

Grant progress reports should identify the project's strengths, in addition to strategies that will correct any weaknesses in the program. The Office of Sponsored Programs is available to assist in the interpretation of funding agency reporting requirements and assist in report writing.

Financial reports are the responsibility of the Grants Manager. The Project Director will be expected to work closely with the Grants Manager to reconcile financial records; ensure appropriate documentation of expenses and matching funds; and come to a clear understanding regarding responsibility for specific financial reporting tasks.

Upon submission to the funding agency by the Grants Manager, copies of all financial reports should be provided to the Office of Sponsored Programs for the College's central grant files.

When preparing grant reports, please be mindful of student privacy requirements. When in doubt about what types of student information to include in a report, consult with the Director of Sponsored Programs and Strategic Initiatives and/or the College's Registrar.

2I. Disseminating Results

Increasingly, funding agencies are asking grantees to develop plans for the dissemination of the results and products of funded projects, such as evaluation reports, project models, handbooks, manuals, and data collection instruments. If such a plan is included in the grant proposal, Project Directors may use it as a guide to ensure that required information is distributed to the appropriate professional organizations and publications, and to ensure that professional presentations are scheduled with local, regional, and national meetings and conferences.

If the proposal does not include dissemination plan, results may still be disseminated via professional presentations and conferences as appropriate. At minimum, all project materials and results should be submitted to the funding agency, to institutional personnel who have been involved with the project, and possibly to news media, if applicable, via the College's Director of Marketing and Community Relations.

2J. Continuation Awards & No Cost Extensions

<u>No-Cost Extension Requests</u>

If grant funds cannot be fully expended prior to the project end date, some funding agencies will allow grantees to request a no-cost extension, which allows more time to complete activities and expend funds. No additional funds are provided under this arrangement. A no-cost extension is a type of amendment (see section 2D; Modifications/ Amendments), and the same procedures apply. The Project Director must coordinate with the Office of Sponsored Programs and the Grants Manager prior to submitting a no-cost extension request.

<u>Continuation of Multi-Year Project</u>

When a multi-year grant reaches the end of a grant period, the Project Director must prepare for continuation funding for the next budget period. In most cases, a revised budget for the upcoming year will need to be submitted, and, in some cases, the funding agency may require a continuation application. The Project Director is responsible for communicating with the Program Officer to determine requirements for the continuation award, and ensure compliance. The Project Director should consult with both the Director of Sponsored Programs and Strategic Initiatives and the Grants Manager prior to submitting any budget revisions or continuation applications.

Depending on funding agency requirements, it may be necessary to create a new FOAP in Banner for each grant year. Consult with the Grants Manager 90 days prior to the end of first grant year to ensure that the FOAP can be requested and assigned in a timely manner, to avoid disruptions in grant expenditures. If a new FOAP is assigned for a subsequent grant year, the Project Director is responsible for notifying Human Resources, Payroll, and other departments that are responsible for administering grant-related expenditures.

2K. Close-Out

Most funding agencies have required processes associated with closing out grant projects. It is the Project Director's responsibility to familiarize him or herself with these requirements, and ensure that they are completed prior to his or her last day paid from the grant. Any questions regarding this issue can be directed to the Office of Sponsored Programs.

In preparation for project close-out, the Project Director is expected to work with the Office of Sponsored Programs and the Grants Manager during the last three to six months of the grant performance period to: (1) ensure appropriate retention of grant records; (2) complete and document all final grant expenditures; (3) prepare and submit final programmatic and fiscal reports; (4) finalize plans for disposition of project-related equipment and supplies; (5) verify the completeness of all project-related time and effort reporting; (6) ensure appropriate documentation of all matching funds. (See Appendices for complete close-out procedures.)

The Project Director must ensure that all records retained as a part of the close-out process are appropriately organized and labeled prior to storage so that they are readily accessible in the event of an audit.

<u>Special Close-Out Consideration: Personnel</u>

If the grant supports personnel, the Project Director is responsible for notifying Human Resources at least 60 days prior to the project end date, so appropriate preparations can be made to either terminate the position or allocate compensation to other funding sources.

If a project that funds College faculty ends in the middle of a semester, the Project Director must coordinate with Human Resources at the beginning of the last fully-funded semester. The College may choose to terminate grant-funded faculty contracts at the end of the fully-funded semester, rather than continuing the position for only a partial semester, to minimize disruption in teaching responsibilities. Grant-funded personnel without teaching responsibilities would not be impacted by a mid-semester end date.

Conflict of Interest Disclosure

All Principal Investigators/Project Directors and other key personnel responsible for overseeing the administration of grant-funded projects at Northeast State Community College (NeSCC) must read and acknowledge their understanding of this statement. The acknowledgement may be submitted electronically, through the College's grant management software, or via a physical signature on a hard copy form submitted to the Office of Sponsored Programs.

Definitions:

Principal Investigator/Project Director - The employee who coordinates the conduct of allowable and effective activities that support achievement of the proposed or funded grant project goals, objectives or educational activities, whether Northeast State is the primary awardee or subrecipient of a grant.

Conflict - A situation that actually has or has the potential to compromise or undermine an individual's professional obligation or public duty, due to a personal interest that could allow the individual to personally benefit from his or her work on a grant proposal or grant project.

Under the federal regulations (2 CFR 200), a conflict of interest may directly and significantly affect the design, conduct, or reporting of the project. The College is required to manage, reduce, or eliminate any potential or actual conflict. Failure to make required disclosures can result in any of the following: public disclosure of the conflict, modification of the project, monitoring of the project by independent reviewers, suspension or dismissal from the project. If conflict is financial, the NeSCC employee(s) may have to discontinue the compensated activities or divest themselves of the financial interest, or discontinue the project.

Acknowledgement

By indicating your approval of this statement through an electronic request generated through NeSCC's Grant Navigator software or through a wet signature on a physical copy of this document, you are certifying your assent to the bulleted items listed below. If approving electronically, you agree that your approval is your electronic signature, and is the legal equivalent of your manual signature on this agreement. By electronically approving or physically signing this statement, you consent to be legally bound by this agreement's terms, conditions, and representation.

☐ I have read, understand, and agree to comply with the conflict of interest policies of NeSCC and TBR as follows**:** **NeSCC Policy 04:10:00 Conflicts of Interest**

☐ I have read, understand, and agree to comply with additional conflict of interest policies as applicable by the funding agency.

☐ I understand that I am required to disclose in writing any actual or potential conflict of interest to NeSCC's Office of Sponsored Programs. This also includes all violations of Federal criminal law involving fraud, bribery, or gratuity violations potentially affecting the Federal award. I understand that I have a continuing obligation to disclose in writing any actual or potential conflict of interest that may arise. I understand that this disclosure must occur within seven (7) calendar days of becoming aware of any actual or potential conflict of interest.

If you **DO NOT**, as of the date of this disclosure, have an actual or potential conflict that would affect the proposed project activities as it relates to your professional duties and responsibilities under this grant, indicate your approval of this document without comment.

If you **DO** have an actual or potential conflict that would affect the proposed project activities as it relates to your professional duties and responsibilities under this grant, indicate your approval of this document and enter a full description of the actual/potential conflict in the text box provided.

NORTHEAST STATE

We're here to get you there

Grants Management Responsibility Matrix Post Award

Project Director	Business Office/Grants & Contracts	Grants Office
Implement appropriate start-up activities	Set up project accounts and establish account numbers	Post-award meeting with Project Director, Grants and Contracts, & Other Key Personnel
Establish a relationship with the funding agency Program Officer	Respond to budget questions	Assist Project Director with Grant Administration forms
Follow college regulations during project implementation (hiring, accounting, record retention, etc.)	Verify matching funds and in-kind contributions, endowment	Assist with securing signatures on contracts and agreements
Reconcile budget at least monthly; contact Grants and Contracts about discrepancies.	Prepare & submit all financial reports	Negotiate and secure agency approval for budget and/or program modifications
Forecast budget spending plan	Prepare & submit invoices and/or reimbursement requests to funding agencies	Help to resolve issues & troubleshoot as needed (facilitate meetings, etc.)
Track matching funds and in-kind contributions, if included in funding proposal	Interpret agency policies and procedures, Purchasing assists with bid processes	Answer program-related questions and support compliance
Prepare & submit all required time & effort reports	Close out financials for project	Coordinate site visits with funding agencies
Seek answers to budget and program-related questions		Maintain file copy of all grant reports
Approve requisitions in Banner		Provide technical assistance as needed
Follow funding agency policies and procedures		Maintain all grant administration records
Submit all required grant reports (internal or external)		
Spend down budget to $0 according to the approved budget		
Complete project on time and on budget		
Ensure project evaluation is completed and submitted on time		
Meet with External Program or Contract Monitor, as requested		

Revised 10-4-2024

Foreign Talent Recruitment Programs (TBR Guideline A-115)	
The following questions are being asked in order to comply with federal law as outlined in TBR Guideline A-115 Foreign Talent Recruitment Programs. Northeast State personnel will review responses to ensure compliance with federal law and to take appropriate actions as necessary.	
1a. Is this proposed study in connection to or part of U.S. federally funded research activities?	☐**Yes** ☐ **No**
1b. If yes, is the Principal Investigator or anyone taking part in the research a participant in a Foreign Talent Recruitment Program (as defined in TBR Guideline A-115)?	☐**Yes** ☐ **No**
1c. If yes, please identify the relevant person(s):	
2a. Are any of the identified persons above a participant in any Malign Foreign Talent Recruitment Program (as defined in TBR Guideline A-115)?	☐**Yes** ☐ **No**
2b. If yes, please confirm the relevant person(s) and identify the specific program(s) in which this person or these persons are participating:	

Project Director Acknowledgement:

______________________________________ ______________________
Signature **Date**

The Project Director's signature indicates acknowledgement and understanding of the responsibilities delineated above.

NORTHEAST STATE
We're here to get you there

Request for Grant Modification

Grant/Project Title:				
Grant Award #: (Funding Agency)		**Fund #:** (Banner)		
Grant Period:	Start Date:		End Date:	
Total Amount of Grant Award:				
Project Director:				

Reason/Justification for Request: (check all that apply)

☐ Budget Modification	☐ Programmatic Modification	☐ No Cost Extension	☐ Other: (Specify)

Detailed Description of Programmatic Modification and/or Justification for Budget Modification:

Budget Modification Details:

Budget Category	Current Budget	Account Code	Requested Adjustment	Adjusted Budget
TOTALS			**$0**	

Requested modification requires approval of grantor:	☐ Yes	☐ No

If yes, please describe or attach a copy of the funding agency's modification procedure:

Additional Conditions/Requirements

*All requests for modifications must be approved internally before the project manager sends the request to the funding agency for approval.

*Costs that overrun the budget will become the responsibility of the project director's department/division.

Approvals:

Position	Signature	Date
Project/Budget Manager		
Grants Manager (Finance)		
Director of Sponsored Programs & Strategic Initiatives		
Supervising Vice President		
President		

Northeast State Community College

Sample Case Management Policy

For Grant-Funded Projects

Outreach: The Success Coach will reach out to designated caseload students using multiple methods of communication (in-person, email, phone, and postings).

Participation: The defined target population shall receive priority of service with the Success Coach. If time allows after the target population is served, other students in the ***<insert program of study>*** program may receive coaching services.

Recording of Participant Intake: Students in the defined target population will voluntarily provide intake information during a one-on-one intake meeting with the Success Coach. The Success Coach will record responses in accordance with funding agency data requirements using established online or hard copy intake forms.

Target Population Participation: Participants will utilize coaching services voluntarily.

Recording of Interactions: The Success Coach will record meeting notes for scheduled or unscheduled coaching sessions and any email exchanges that result in a plan or an action item for a student. Informal conversations that do not result in an action item or next step will not be recorded.

Record Retention: Case management notes and related records will be retained and archived in accordance with Northeast State, State of Tennessee, and funding agency guidelines.

Northeast State Community College
Sample Participant Enrollment Policy
For Grant-Funded Projects

I. Purpose

The purpose of this document is to detail the procedures for enrolling students and outline the tasks of the Success Coach and the Project Director.

II. Summary

This document outlines the NeSCC procedures to be used by the Success Coach and Program Director when enrolling students. The Program Director will review steps for Eligibility and Intake Plans, the Assessment Process, and Eligibility Determination with the Success Coach. A copy of the Intake Application is attached.

III. Procedures

a. Eligibility and Intake Plan

Initial assessment of participant eligibility will occur during recruitment and is executed by the Success Coach. At an eligibility intake meeting, participants will complete the Intake Application. This application screens for target population membership, WOIA eligibility, education, and work experience. All applications will be reviewed by the Program Director and Success Coach and kept by the Success Coach, who will ensure that participants meet eligibility criteria. The participant is then referred for a full assessment, if appropriate.

b. Detailed Assessment Plan

The Success Coach will be responsible for performing the assessment and entering the participant into the participant tracking system. The intake application will use educational records, employer recommendations, and guidance from employment partners on industry skill sets to identify candidates likely to successfully complete the program. The program will evaluate past educational attainment, test scores, and transcripts. If needed, participants will complete a placement test. By providing a pathway to credit prior learning, the barriers to degree attainment for many non-traditional students will be reduced. Assessments will help to (1) develop a baseline of work experience and skills; (2) identify math and/or reading deficits using a recognized instrument such as the Test of Adult Basic Education (TABE); and (3) develop an appropriate supportive services schedule, providing a roadmap for completion.

c. Eligibility Determination

The intent of this grant is to provide <***tuition-free education/job training to unemployed, underemployed, and incumbent workers – including disadvantaged populations such as low-income, underrepresented in the targeted industry, dislocated workers, and other populations with training and employment barriers – to help them pursue or advance in middle- to high-skilled employment in H-1B industries.***> We are required to ensure that our outreach strategies and education/job training programs are designed to address barriers for the individuals served.

No more than 25 percent (25%) of the total participants served may be incumbent workers who meet the eligibility criteria. All training participants must be older than 16 years of age and not currently enrolled in school within a local educational agency. Within these types of participants eligible to receive training, we may serve a wide range of individuals, such as veterans, minorities, Indian and Native Americans, foreign-trained immigrants, underrepresented populations in H-1B industries including women, low-income individuals, and other individuals.

Northeast State Community College

Sample Participant Eligibility Policy

for Grant-Funded Projects

A participant is any student who enrolls at the College with a declared ***<insert program of study>*** pathway. High School students enrolled in dual enrollment ***<insert program of study>*** coursework will be excluded as these students do not enter with the goal of completion. Students enrolling in ***<insert program of study>*** pathways in the Spring semester will be excluded as their path to completion may be atypical due to challenges with course sequencing.

**This policy should be customized to the eligibility requirements specific to each award and/or funding agency.

Northeast State Community College

Sample Participant Exit Policy

For Grant-Funded Projects

Participants are considered exited from the program if one of the following occurs:

1. Student is awarded a degree in a ***<insert program of study>*** degree pathway
2. Student changes declared major to a non-***<insert program of study>*** degree pathway
3. Student is not enrolled in at least one course in sequential semesters in an academic year as defined by TBR 2.04.00.00

Northeast State Community College
Sample Supportive Service Policy
For Grant-Funded Projects

I. Purpose

This issuance outlines the policy and procedures for the provision of supportive services for participants of the ***<insert grant program name>***. The purpose of supportive services is to mitigate academic and/or nonacademic barriers to successful enrolment, retention, and completion of the grant-supported training and other approved activities.

II. Summary

Supportive services are allowed to assist a participant with attending and completing education and training classes and fully participating in approved grant activities. This policy outlines the process and types of supportive services allowed under the ***<insert grant program name>*** consistent with the executed grant agreement.

III. References *(replace with relevant references for specific grant program)*

- U.S. Office of Management and Budget Uniform Guidance at 2 CFR 200
- U.S. Department of Labor, Employment and Training Administration, Solicitation for Grant Applications, FOA-ETA-20-03

IV. Protocol

Northeast State Community College (NeSCC) deploys a comprehensive structured support strategy to address barriers to successful education and training program completion by grant participants. As part of intake and assessment of participants, supportive services needs will be identified on a case-by-case basis. NeSCC specifically affirms utilizing supportive services for the following two populations:

1. Individuals with Disabilities
   NeSCC is committed to ensuring that qualified individuals with a disability are afforded equitable access to, and participation in, grant-funded programs and services. In accordance with the Americans with Disabilities Act as Amended (ADAAA) and Section 504 of the Rehabilitation Act of 1973, no qualified person will be denied access to, participation in, or the benefits of, any program or activity operated by the College because of disability. Nor will individuals with a disability be subjected to discrimination while participating in college programs or activities due to such disability.

2. Veterans and Families
   NeSCC serves students who are active duty, retired, Reservist or National Guard veterans, spouses of veterans, and dependent children of Service-disabled veterans. Supportive services provided may include:
   - Access to resources, periodicals, and other academic materials for veterans/family members
   - Information regarding Veterans Affairs laws, regulations, and College policies

- Transition and other workshops
- Prior learning assessment for veterans to support and recognize skills attainment while in the military and faster completion through attainment of college credits.

V. Procedures

Approval

As part of the intake and enrollment process, NeSCC grant staff will work with participants to identify supportive service needs. The assessment of supportive services will include a review of family/student income and assets, support needs and family contributions availability identified through the FAFSA process, and the education/training and employment goal. Requirements for uniforms, tools, and other supplies to successfully enter and complete training will also be identified.

Once the assessment process is complete, the grant staff will use the Supportive Services approval form to make a recommendation on the provision of supportive services and source of funds—grant, college, or outside organizations such as the workforce system or community-based organizations. The approval form will receive a second sign-off by the Grant Manager (Financial Office) and then be forwarded to the NeSCC Business Office for processing.

Distribution

The NeSCC Office will review the program recommendation for specific supportive services provision and will concur or send it back for further information. Once concurrence has been reached, the Business Office will obligate any grant funds for use by the participant for the approved supportive services. Funds will be made available through the student's financial account, and grant staff will monitor the appropriate use of the funds by the participant. Participants may be required to show receipts for supportive services purchases, which will be kept in the participant's file.

Participant Acceptance

At the time of intake and the staff recommendation for the provision of supportive services, the participant will sign a statement understanding what has been approved and an affirmative agreement to use such funds appropriately for the support of their training and employment goals.

Once the participant purchases supportive services and provides grant staff with appropriate documentation (such as receipts), the NeSCC Business Office will reconcile the obligation as an accrued expenditure and reflect such amount appropriately on the ETA 9130 quarterly report.

NeSCC Grant Closeout

The federal grant closeout procedure outlines the process by which the Federal awarding agency or pass-through entity determines that all applicable administrative actions and all required work of the Federal award have been completed and takes actions as described in § 200.343 Closeout of the OMB Uniform Grants Guidance.

200.343 Closeout The Federal agency or pass-through entity will close-out the Federal award when it determines that all applicable administrative actions and all required work of the Federal award have been completed by the non-Federal entity. This section specifies the actions the non-Federal entity and Federal awarding agency or pass-through entity must take to complete this process at the end of the period of performance.

(a) The non-Federal entity must submit, no later than 90 calendar days after the end date of the period of performance, all financial, performance, and other reports as required by or the terms and conditions of the Federal award. The Federal awarding agency or pass-through entity may approve extensions when requested by the non-Federal entity.

(b) Unless the Federal awarding agency or pass-through entity authorizes an extension, a non-Federal entity must liquidate all obligations incurred under the Federal award not later than 90 calendar days after the end date of the period of performance as specified in the terms and conditions of the Federal award.

(c) The Federal awarding agency or pass-through entity must make prompt payments to the non-Federal entity for allowable reimbursable costs under the Federal award being closed out.

(d) The non-Federal entity must promptly refund any balances of unobligated cash that the Federal awarding agency or pass-through entity paid in advance or paid and that is not authorized to be retained by the non-Federal entity for use in other projects. See OMB Circular A-129 and see section 200.345 Collection of Amounts Due for requirements regarding unreturned amounts that become delinquent debts.

(e) Consistent with the terms and conditions of the Federal award, the Federal awarding agency or pass-through entity must make a settlement for any upward or downward adjustments to the Federal share of costs after closeout reports are received.

(f) The non-Federal entity must account for any real and personal property acquired with Federal funds or received from the Federal government in accordance with Property Standards and 200.329 Reporting on Real Property.

(g) The Federal awarding agency or pass-through entity should complete all closeout actions for Federal awards no later than one year after receipt and acceptance of all required final reports.

NeSCC Grant Close Out Procedures

The project director/manager/principal investigator (director) is responsible for identifying the funder's requirements for the grant closeout process. Following the designated process, the director will prepare and submit all performance or programmatic reports as required by the funding agency. All programmatic reports must be processed through the Office of Sponsored Programs for review and approval by the President.

The director must ensure that reports reflect a direct connection between grant objectives and grant expenditures. Therefore, the measurable results of grant-funded activities and programs must be incorporated into the final report. The director will work with the Grants Manager in the Office of Finance to complete the final financial reports which consist of a complete record of and related documentation for all project expenditures.

During the last 3 to 6 months of the grant project period, the project director will work with the Offices of Sponsored Programs and Finance to complete the following:

- assessment of project outcomes
- project evaluation(s)
- final expenditures
- documentation for matching dollars/leveraged funds

The Grant Manager in the Office of Finance will be responsible for completing the financial closeout requirement of all grants and will work with director and others as needed to secure the required input. The director is responsible for completing all grant closeout activities prior to his/her last day as a salaried employee paid from the grant.

Records Retention

The project director must follow the College's records retention policy (TBR Guideline G-070 Disposal of Records - RDA 2161) unless the funder specifies a longer retention period. The director will forward electronic and paper files to the Office of Sponsored Programs, including an inventory list of contents.

The final paper files (if any) must be organized, labeled and placed in boxes so that they can be easily accessed in the event of an audit. The label on the box should include the following: Funding agency and program; Grant manager; Grant year and budget period of documents; and purge date.

Retained records must include:

1. Initial award letter
2. Original proposal narrative and cost proposal (budget and budget narrative)
3. All modifications/correspondences,
4. No cost extensions
5. Previously submitted programmatic reports
6. Any and all closeout forms submitted to the grantor
7. Compilation of final project data results and/or progress
8. Required forms and documents in the grantor's closeout package
9. Budget and financial reports
10. Inventory of all project equipment, supplies, and materials
11. Disposition of unopened/unused supplies and materials
12. Time and Effort documentation

.