

GRANT MANAGEMENT HANDBOOK

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INTRODUCTION

The purpose of the Grants Management Handbook is to assist project directors of grant-funded programs with their administrative and fiscal responsibilities, and to make them familiar with services that ensure effective management of grants and contracts. The Rancho Santiago Community College District (RSCCD) Resource Development Department, a department within the district Educational Services Division, facilitates the process of searching for, securing, and managing external funds to support district and college objectives and programs. The Resource Development Department represents the district's commitment to ensuring that RSCCD staff, who are ambitious enough to pursue additional funding for new and improved programs for our students and communities, are helped in making these efforts successful. Project directors (and their staff, if applicable) are encouraged to contact the Resource Development Department (714-480-7463) when they have questions about their projects. Resource Development staff are assigned to projects to help directors most effectively.

As a public agency, the district and its employees are governed by a myriad of internal and external regulations, procedures, and processes. Directors of grant-funded programs must similarly comply with these. New project directors may not be familiar with district policies and procedures related to hiring staff, purchasing supplies and equipment, and entering into contracts, to name a few of the common administrative functions required to start or manage a college program. In addition, a funding agency may have additional and/or slightly different requirements. The Grants Management Handbook describes district policies and procedures relevant to most grant-funded projects, as well as many relevant federal and state regulations, policies, and procedures.

In addition to the Resource Development Department, the district Accounting Department plays a key role in ensuring that grant funds are expended, recorded, and reported according to generally accepted accounting principles, California State Education Code Regulations, and the financial regulations of government entities issuing funding. A highly qualified accountant is assigned to each grant project to assist the project director with financial aspects of the grant. The accountant monitors expenditures and completes all financial reports that are sent to funding agencies.

At RSCCD, strategies to manage grants successfully are constantly being refined and improved. The *Grants Management Handbook* is an integral part of the process. It is very specific in describing the roles and responsibilities of the three major "players" in a grant project: the project director, the Resource Development Department, and the Accounting Department. It also describes, in detail, procedures for program implementation, program management, program closeout, audit readiness, and other support for grant projects. To maximize the usefulness of this handbook as a guide to successful grant management, we recommend that project directors and other project staff should review the entire *Grants Management Handbook* and refer to it often. If the content is not clear or does not answer your question(s), contact the Resource Development Department or the relevant department referred to in the manual, i.e., Purchasing, Human Resources, etc.

The Grant Team: Project Director, Resource Development and Accounting

Project Director's Role

The project director is the most significant person involved in a grant. He or she is ultimately responsible for completing the activities and achieving the outcomes that are the reasons that the grant was funded. He or she is also responsible for ensuring that grant funds are properly used. Thus, a significant amount of a project director's time can be spent on administrative details. In addition to a project director, a project administrator is assigned to each grant project. This is usually the existing direct supervisor of the project director or the dean of an instructional division. The project director and project administrator often share some of the administrative duties of implementing and managing a grant.

Areas of Responsibility: Program, Budget, Evaluation and Reporting

Program:

- Become familiar with the grant terms and conditions delineated in the RFA/RFP/Solicitation¹, grant regulations, and the project proposal.
- Implement the project work plan approved by the funding agency.
- Hire, supervise, and coordinate activities of project staff.
- Identify all major purchases at the beginning of the grant, and submit purchase requests as soon as possible.
- Work with appropriate deans, division and department chairs, faculty, and college staff to implement the program.
- Provide leadership for the project within the college and among community partners.

Budget

- Become familiar with the allowable and unallowable costs for the grant, and the conditions for making changes to the budget.
- Monitor grant expenditures using the district accounting system, Datatel/Colleague, to run budget reports, at least once per month, and by working with Resource Development staff and the accountant assigned to the project to ensure that all funds are spent appropriately, quarterly.
- Initiate and/or approve all direct expenditures to the grant.
- Direct and monitor completion of paperwork to make expenditures to a grant: e.g., hiring (Job Requisition Form, Status Change Form), paying project staff (Payroll Time Sheets), purchases (Purchase Requisitions), etc.
- Maintain copies of all expenditures-related paperwork (hiring, purchase requisitions, conference request forms, mileage reimbursement, timesheets, status change forms, etc.) to document the accuracy of charges

¹ RFA (Request for Applications), RFP (Request for Proposals).

to the grant, which is needed to withstand an audit review.² Grant records must be maintained for up to 3-5 years after the grant ends to meet audit guidelines, or longer if required by the funding agency).

Evaluation

- List the data that will need to be collected to engage in periodic assessment of project effectiveness, to
 evaluate achievement of project objectives, and to document achievement, the work of the project, and
 completion of project activities.
- Establish the system to collect project data at the beginning of the project, working with RSCCD's or the college's Research Departments, as needed. Assessment will need to be in place before the activities to be measured occur.
- Monitor completion of project activities and progress toward achievement of project performance objectives on a continual basis, at least quarterly.

Reporting

- Ensure that time-and-effort reports are accurately completed and submitted to Accounting on a <u>monthly</u> basis.
- Know the reporting schedule required by the funding agency.
- Collect data and information needed to complete reports and back-up the information contained in them.
- Complete reports and submit them on time.

Resource Development's Role

For grant projects to function efficiently and effectively, the district has established procedures that involve various departments. These procedures will help the project director administer the grant-funded program consistent with the standard operating procedures of the district and the requirements of the funding agencies. A Resource Development staff member is assigned to each project to assist the project director and staff with budget and program planning, to develop the grant budget for each project and/or fiscal year and prepare it for entry into Datatel, review budget change and status change forms to ensure compliance with grant terms and conditions, and to answer directors' questions about compliance issues.

Areas of Responsibility: Grant Documents, Budget Development, Budget & Program
Planning, Sub-award Agreements, and Audit Files

Grant Documents

 Prepare grant documents requested by the funding agency: e.g., grant face sheets, assurance and certification forms, Board Resolutions, etc.

² RSCCD undergoes an audit every year, at which time the auditors randomly select grant projects to ensure that the District has effective internal controls in place to manage funds appropriately.

Budget Development

- Calculate budget amounts for all grant proposals, grant renewals, and carryover budgets.
- Develop annual line-item expenditure budgets for board approval (docket) and submit the budget to the Accounting Department for input into the district accounting system.
- Request new accounts for project budgets.
- Review and approve budget change forms, and forward to the Accounting Department.

Budget and Program Planning

- Advise projects on expenditures, movement of funds, and transfer of expenditures.
- Develop salary and benefit cost projections upon request from directors.
- Assist project staff by analyzing problems with project expenditures and recommend solutions.

Sub-award Agreements

- Develop sub-award agreements and submit them to the director, partner, and district for review and approval. Prepare sub-award agreements for Board approval (docket).
- After approval obtain the approval signature from the Vice Chancellor of Business Operations and Fiscal Services, and mail signed sub-award agreements to partners (sub-recipients) for approval on their end.

Audit Files

 Maintain hardcopy and electronic files that will include: the application packet (RFA/RFP/Solicitation); award letter; fully executed contract with funding agency; set of related regulations; original line-item budget; originals of executed sub-award agreements with partners (sub-recipients); copies of relevant correspondence with funding agency, Accounting Department, or other parties related to budget; copies of interim and final reports; and copies of project audits.

Director of Grant's Role

The Director of Grants provides assistance in developing a grant proposal, researching grant regulations to ensure compliance, establishing processes and procedures to meet grant terms and conditions and audit standards, as well as providing guidance on program and budget development and district processes and procedures.

Areas of Responsibility: Consultation and Guidance, Policies and Procedures,

Liaison to Funding Agencies, and FSRS Reporting

Consultation and Guidance

- Conduct Grant Start-Up meeting to orient directors, administrators and staff to their roles in grant
 management, including a review of district and funding agency regulations and procedures, to ensure that all
 projects will successfully pass all program and financial audits.
- Respond to director's and staff's inquiries related to compliance with grant terms and conditions and state
 and federal regulations, and district policies and procedures.

Assist project directors with more complex, non-routine aspects of project implementation, as needed.

Policies and Procedures

- Monitor the department's operations to maintain a system that reduces errors and ensures compliance.
- Work with District's departments related to grant implementation (e.g., Accounting, Payroll, Human Resources, etc.) to improve processes and procedures as needed to ensure that grant projects meet audit standards and are in compliance with grant terms and conditions.

Liaison to Funding Agencies

Contact funding agencies to clarify specific agency procedures and/or regulations.

FSRS Reporting

• Complete FSRS (federal sub-award reporting) reports for compliance with the Transparency Act.

Website: Go to <u>www.rsccd.edu</u> > from the Departments menu at the top of the screen select Resource Development.

https://www.rsccd.edu/departments/resource-development/Pages/default.aspx

Accounting Department's Role

RSCCD designates staff from the Accounting Department to provide financial oversight to grant-funded projects. One accountant or senior accountant is assigned to each project. The accountant coordinates with Resource Development staff to ensure that expenditures are allowable and consistent with the policies and regulations of both the funding agency and district. The accountant also prepares quarterly, interim, annual and final financial reports for the funding agency.

Areas of Responsibility: Create Accounts, Financial Reporting, Track Grant "Match",
Distribute & Collect Time-and-Effort Reports, Grant Income

Create accounts

Process requests for new project numbers and accounts submitted by Resource Development.

Financial Reporting

- Complete the financial portion of reports required for each grant according to the schedule determined by the funding agency, and review with the project director to ensure accuracy, as needed.
- Submit and certify the financial portion of reports to the funding agency.
- An accountant will contact a project director primarily when there are over-expenditures in an account in
 the budget and when financial reports need to be prepared for submission to the funding agency. Project
 directors should use the district's accounting system (COLLEAGUE by Datatel) to regularly check budget

expenditures and balances to avoid over-expenditures and under-expenditures of their funds, as well as to identify erroneous charges to their budgets.

Track Grant "Match"

Assist project director to develop methods for tracking unconventional match for a project, and maintain
documentation of said match. Usually, match is tracked by creating a district-funded account in the grant
budget. However, when match for a project is provided from outside the district, a system to track and
document it must be developed.

Time-and-Effort Reports

- Option 1: Accounting will distribute, collect, and review time and effort reports to document the amount of time staff work on a grant project.
- Option 2: The Project Director uses the Excel versions of the time and efforts reports and certification forms, and completes these forms on a monthly basis. Recommended for programs supported by multiple budget and/or for programs that often change staff assignments and allocated time to grant projects.

Grant Income

- Submit requests to draw down funds through federal financial systems (federal grant awards only).
- Allocate grant funds received from state and local/private funders to the corresponding project budget in Datatel.

RSCCD is reimbursed by a funding agency through properly executed and documented expenditures. Therefore, it is necessary to keep records to document all expenditures and to post all expenditures to the correct accounts in the budget, in order to accurately prepare interim and final financial reports. In addition, it is essential that all grant funds be spent by the end of the grant term.

While the Fiscal Services and Human Resources departments maintain original documentation regarding financial and personnel matters, project directors are also required to keep copies of all of these records. The project director should contact the accountant immediately when there are discrepancies between the director's own records and those that appear in a budget report.

For more information about Accounting, related forms and manuals, visit their webpage.

Website: Go to www.rsccd.edu from the Departments menu at the top of the screen select Business Operations & Fiscal Services > then, select Fiscal Services from the menu on the left side of the screen

https://www.rsccd.edu/Departments/Fiscal-Services/Pages/Fiscal%20Services%20Department.aspx

Budget Implementation

Making a Grant Budget Operational

The project director can begin to spend grant funds by the start date set by the funding agency. Once the district is notified of a grant award, timing is crucial because there are six steps to make a budget operational.



- 1. Develop the Budget: Resource Development develops a detailed line-item budget based on the budget submitted in the approved proposal. The initial line-item budget must match the budget in the proposal, or as a result of budget negotiations, approved by the funding agency.
- 2. Request a Project Number: Resource Development requests a project number and accounts for the budget from the Accounting Department.
- 3. Fiscal Vice President/Vice Chancellor Approval (match): Resource Development will submit the match budget to the Fiscal VP (campuses) or Fiscal VC (district office) to approve the match allocation, as documented by signature.

- 4. Board Approval: The budget is submitted to the Board of Trustees for approval during a scheduled board meeting.
- 5. Budget Entered into the Accounting System: After board approval, Resource Development sends the budget to the Accounting Department to input it into the accounting system.
- 6. Distribution: A copy of the budget is sent to the project director via interoffice mail or email.

Making a Program Income or Cash Contribution Budget Operational

Some programs generate income through their services and/or receive cash contributions from donors who want to support the program. Program income and cash contribution funds have to be accounted for separately by creating a separate program income budget or cash contribution budget, each with its own unique budget number. For these types of funds, the process to make the budget operational is slightly different than the one used for grant-funded budgets.

- Program Income: submit to Resource Development the funds (checks or cash) received through providing
 services and attach back-up documentation indicating the service provided, cost, date, and people served:
 such as, a workshop attendee list and marketing flyer. Cash Contribution: submit to Resource Development
 the funds with a copy of documentation from the donor identifying the contribution as donation to the
 program.
- 2. Resource Development reviews the program income or cash contribution documents and funds to make sure they correspond, and writes the income account number on the documentation to indicate to Accounting where to deposit the funds. A copy is made of all items, and they are submitted to Accounting. *If a program income budget or cash contribution budget specific to the program does not exist, Resource Development staff will submit a request to create a unique budget number and accounts for program income or cash contribution, or both, as needed.
- 3. The project accountant checks that the back-up documentation and funds correspond, and deposits the funds into the account indicated by Resource Development.
- 4. At quarterly intervals, or other times as appropriate, Resource Development will work with the project director to update the budget in the accounting system to reflect the income received by allocating it in the expenditure accounts.
- 5. A copy of the budget is sent to the project director via email.

Components of a Budget

Each grant is assigned a unique, 4-digit project number: Accounting and Resource Development refer to this number as the "special project number." Each special project contains a series of accounts (also referred to as line-items). Each account/line-item represents a specific spending purpose. An account is created with a series of numbers that tells different things about that line-item, as described below. You will use these numbers/codes for spending, tracking expenditures, and making changes in your budget during the course of the project. Each account is structured as follows:

Fund	-	Project #	-	TOPS/Activity	-	Department	-	Object
00	-	0000	-	000000	-	00000	-	0000
12	-	1603	-	675000		53345		5210

Example

Explanation of Example: 12-1603-675000-53345-5210. 12 indicates grant funded, 1603 is the unique project number assigned to the project, 675000 indicates that the activity if for staff development, 53345 indicates the Resource Development Department and 5210 is for Conference/Travel costs.

Description of the Components that Comprise an Account String

	11 - General Funds: general fund accounts are sometimes included in grant budgets to document "match," i.e., what the college is contributing to the project. <i>NOTE: not</i>
Fund Codes	all grants require match.
First two digits (XX-)	12 – Grant Funds: all accounts with a fund code of 12 are grant funded.
	74 – Student Financial Aid and grant funds paid to students.
	Project number codes: the first digit of the project number will be a 1, 2, or 3.
	1 – Federal: Project numbers that begin with "1" are federally-funded grants.
Project #	2 – State: Project numbers that begin with "2" are state-funded grants.
	3 – Local/Private: Project numbers that begin with "3" are locally-funded (e.g., the
4 digita	city, county, chambers of commerce) or foundation-funded (e.g, Kellogg Foundation,
4 digits (-XXXX-) following the	Gate Foundation) grants.
Fund Code	Accounting assigns a project number for each grant. If a grant has a different term than RSCCD's fiscal year (July 1 st – June 30 th), and the grant has multiple years (e.g. a three-year or five-year grant), then each year will receive its own project number, so that each project year's funds are clearly differentiated from each other.
TOPS/Activity	These codes are developed and published by the California Community Colleges
,	Chancellor's Office to identify an account with a specific activity. Activities are
Codes	broken into two categories, instructional (100000 – 499999) and non-instructional
6 digits	(500000 - 739000). Based on a director's explanation of what he/she will be doing in
(-XXXXXX-) following the special project #	the project, the Resource Development staff will assign the activity codes to the
the special project #	accounts.

	-		
Department Code	Each department at SAC, SCC, and DO has been assigned a department code. Grant project accounts will usually contain the department code based on who the project director and administrator are. Department codes: The first digit of the department code will be a 1, 2, or 5		
5 digits	1 – Santa Ana College		
(-XXXXX-) following the TOPS code	2 – Santiago Canyon College		
	5 – District Office		
Object Codes The last 4 digits (-XXXX) of the account string	Object codes are used to identify the nature of an expense. There are 9 major categories that contain sub-categories. However, grant projects only use 7 of them; the other two are for Accounting. 1000 – Administrators, counselors, and faculty salaries 2000 – Classified salaries 3000 – Benefits 4000 – Supplies 5000 – Contracts and services 6000 – Equipment 7000 – Support for students (fees, books, stipends, etc.)		
	8000 – Income accounts (Accounting's use only) 9000 – Accounts (Accounting's use only)		

Resource Development staff will create a budget listing all of a project's accounts (see example below).



1. Special project number: four-digit number that identifies the project in the COLLEAGUE system

Name: title of the project and site where it is located

Heading: includes the duration of the grant, the amount of funds, who is responsible

Date: date Resource Development created the budget.

<u>CFDA #</u>: Federal grant opportunities are published in the Catalog of Federal Domestic Assistance (CFDA) and are assigned a number. This number is important for audit purposes and communication with federal agencies.

Funding Source: the agency, bill, or act that is the source of funding for the grant.

- 2. An 11- prefix indicates that the line-item accounts are for match. Some grant projects have "MATCH," which is when the district is required to contribute to the project. Match accounts are charged just like grant-funded accounts, although match accounts are primarily for salary and benefits.
- 3. Line-item accounts for the grant-funded budget. The 12- prefix indicates grant-funded accounts. Sometimes a 74- prefix can be listed in a grant budget, which indicates that funds are being given to students, an action that has to be coordinated with the Financial Aid Office and/or Student Business Office.
- 4. Budgets are created using a Debit and Credit system. Debits represent the expenditures; Credits represent the total funds available to be spent.
- 5. Total Match
- 6. Total Grant Funds

Object Codes

Of all of the numbers in an account, object codes are the most important for project directors and their staff to understand because they specifically define how the budgeted funds can be spent. In a budget report a brief description of the object code is provide. There is also a *Chart of Accounts* that defines these codes. Contact an accountant for a copy of the *Chart of Accounts*.

Oftentimes, projects will require new accounts because their initial budgets did not have accounts with object codes they now need to use. When this occurs, a project director or staff must contact the assigned Resource Development staff to set up a new account. Subsequently, funds will have to be moved from an existing account to the new account. Some grants limit the types of expenditures and changes that can be made, such as whether equipment can be purchased. Project directors should know this, but the Resource Development staff will also

double-check the grant's regulations so that only allowable expenditures can be made. More information about budget changes is in the Grant and Budget Management section of this handbook.

Match

Many times funding agencies require grant recipients to contribute resources to show commitment and to provide additional support for the project. This is known as "match". Match can be in the form of *cash match*, i.e., the district pays for actual costs of the grant, or "in-kind" match, i.e., the district, or other organization, makes existing resources available for use by the grant. An example of cash match would be the district paying for faculty salaries to teach classes developed under a grant. An example of in-kind match would be providing facility space for the project to operate. In some cases, other relevant grants may be used as match. Sometimes grant projects can be used to match other grant projects, as long as 1) there is a real contribution to the project, 2) federal funds are not used to match other federal grants, and 3) state grants are not used to match other state grants.

In all cases, whatever is used as district match must be an allowable cost and it must be quantified in dollars. It is important to note that match expenses must be documented. In most cases the specific match has already been identified in the original grant proposal and is included in the line-item budget. The Director of Grants or Resource Development Coordinator will review the required match with the project director when reviewing the entire project budget at the Grant Start-Up Meeting. In some cases of in-kind match, it will be necessary to develop a system for documenting match outside of the COLLEAGUE system. The project director needs to work with the accountant and resource development staff to ensure that match is documented correctly.

Program Implementation

The Project Work Plan

Every grant proposal includes a project Work Plan. The Work Plan essentially defines the grant program that will be implemented. It lists the project's activities, outcomes to measure whether activities are completed and effective, responsible persons, and a timeline. Project directors should keep a copy of the work plan accessible, refer to it to guide planning and project implementation, and use it as a tool to monitor progress.

Hiring Project Staff

All project directors must coordinate hiring of staff with the Human Resources Department. District policies must be followed in all hiring. No one should offer someone a paid or volunteer position without first discussing it with Human Resources.

Human Resources has published its guidelines on the RSCCD Intranet: go to www.rsccd.edu > Employee Internet > enter logon and password > click on Human Resources link on the left side of the page. Project directors can retrieve the following information from the intranet:

- Supervisory/Confidential Regulations
- RSCCD Full-Time Faculty Hiring Regulations
- FARSCCD Bargaining Agreement
- Child Development Teachers Agreement
- CEFA Bargaining Agreement
- CSEA Bargaining Agreement
- Online Documents and Forms
- Job Descriptions (Classified and Management)
- Classified Dockets and Addendums
- Management and Academic Dockets and Addendums

Human Resources can give you complete information and services regarding hiring procedures, personnel benefits, terminating procedures, etc. Human Resources also assists in the recruitment, interviewing, and screening of applicants, and other personnel-related activities.

Guidelines for Hiring Personnel Under a Grant

Start the Process Early	RSCCD must follow a number of regulations and procedures when hiring personnel. The hiring process can be lengthy, and should be the first priority. Once the official award letter or contract has been received from the funding agency, project administrators or directors can work with HR to conduct the hiring process, including advertising, recruiting, interviews, and offering the position. <i>Employees may not start working before the start date of the grant term.</i>
Equal Opportunity Employment	All faculty, administrative, professional, and classified personnel, as well as student workers, will be recruited, hired, and promoted in accordance with the district Equal Employment Opportunity policies.
Position Announcements	All new and/or vacant positions must be advertised in accordance with established personnel and district standards to ensure that new members of RSCCD and the general public are made aware of such openings.
Starting a New Employee	 Please remember that new employees cannot begin working until: They have taken the skills evaluation (where applicable); Human Resources confirms that they meet the minimum qualifications; They have been TB tested and fingerprinted; They have completed the employment packet, which means they have submitted all necessary paperwork; and Their hiring has been approved by the Board of Trustees.
Re-Hiring Former Employees	Former employees who have not been working for the district for less than one year do not need to redo the hiring paperwork, be fingerprinted, or have a TB test, if their TB test was completed less than four years ago. New status change forms need to be completed for their new assignment.

Employee Classification Definitions and How They Impact Hiring Decisions

Each type of district employee is governed by a bargaining agreement or board policy and administrative regulation. The rules that govern each employee classification must be considered before beginning the hiring process. Following are definitions of district employee classifications and issues to consider when hiring each classification of employee.

Contract Classified Employees	Employed 20 hours or more per week, are part of a bargaining unit (CSEA, Child Development) and earn longevity points for their time in their job classification. When a grant ends, they can only be terminated through the layoff process. As a result, they may be able to "bump" another employee in that same classification in another department who has less longevity. Since most grants are funded for a limited time, the issue of termination or institutionalization of positions should be discussed when a proposal is first developed.
Ongoing- Hourly Classified Employees	Work 19 hours or less per week and are part of the CSEA or Child Development bargaining unit. On-going, hourly employees can only be terminated through the layoff process and have the same "bumping" rights as contract employees. Hourly on-going employees cannot work additional short-term or substitute hours in the same classification as their ongoing position for more than 19 consecutive work days per Section 14.9 of the CSEA contract. If they do work additional hours for 20 days or more, their on-going assignment must be permanently changed to those hours in order to acquire benefits. This means that if you hire a 19-hour ongoing program specialist, for example, and the person works an additional short-term assignment of 21 hours per week for 20 days or more, the district has to hire them as a 40-hour per week contract employee who is entitled to insurance, fringe benefits, and contract salary. Please be aware of this when scheduling on-going employees for short-term or substitute assignments in the same classification as their regular position.
Short-Term Hourly Classified Employees	Are not part of a bargaining unit and are hired on a temporary basis to complete a short-term project, to help with peak times, etc. Short-term employees may work from one to 25 hours per week in one or more jobs, but their combined hours per week in all positions cannot exceed 25. They can work up to a maximum of 39 weeks per year. Due to the short-term nature of some grants, it is recommended that part-time classified personnel be hired as "short-term" staff. While this may limit the number of days an employee may work in a year, it prevents having to initiate a layoff process when a grant ends. Short-term staff can and should be informed of the temporary nature of the position.
Substitute	An ongoing hourly or contract employee may fill in for another permanent employee who is out on sick leave, extended sick leave, vacation, comp time, worker's compensation, or leave of absence (paid or unpaid). They can substitute one to 40 hours per week, depending on the hours of the position they are substituting. A short-term employee can only substitute up to the number of days they are limited to as a short-term employee.

Employment of faculty has to be coordinated with the appropriate dean, director, vice president, and Human Resources. The project director needs to work with the appropriate dean and HR when hiring full-time and part-time credit instructors, coordinators, librarians, contract education instructors, non-credit full-time and part-time instructors, and full-time and part-time counselors. Assignments common to grant projects: Portion of full-time faculty contract: Assigns a percentage (e.g., 5%, 15%, etc.) of a contract faculty's time to work on a project. This can be costly. Release to work on a project: Adjunct faculty are hired by the grant to release a full-time contract faculty member to work on the project. Faculty work beyond their contract assignment, otherwise known as overload. **Faculty** <u>Stipends</u>: only full-time contracted faculty may receive stipends. Stipends may be a more useful method of payment if the hours of work on the assignment can fluctuate, or if the focus is less on time and more on work product produced. (See examples below.) Stipends must be Board approved. Example 1: faculty mentors may be assigned to a project and interact with students in different ways: set hours each week; intensive mentoring for a project during a specific time period; text, call and email mentoring. Tracking by hours would be cumbersome and the number of hours is not a reliable measure of the impact or effectiveness of mentoring. <u>Example 2</u>: a stipend may be a better choice for payment if the assignment is not about time but about a deliverable or work product (handbook, presentation, etc.). NOTE 1: Some funders have restrictions on hiring, and hiring for all grant project will need to adhere to such restrictions. For more information regarding faculty go to www.rsccd.edu, click on Employee Intranet. HR policies and regulations are posted under "Handbooks & Policies." Are students or other persons employed as faculty and must meet minimum qualifications identified in the California Education Code Reference: Sections 87101 and 87487. Human **Faculty** Resources will work with the project director with the processes and procedures for hiring Interns faculty interns. Faculty interns must also follow the procedures non-faculty interns detailed below.

An intern or volunteer must have board approval before working. To process a volunteer or non-paid intern for board approval, please have the individual submit the following to Human Resources: 1) Completed and signed volunteer service form, or intern service form (non-paid); 2) Live Scan fingerprinting receipt; and

Non-Faculty Interns or Volunteers

3) TB test result. The individual must be board approved prior to commencing his/her service. If a volunteer's or intern's assignment changes, a new service form will need to be submitted and approved anew by the Board. Human Resources handles these board items.

The costs for fingerprinting and TB testing are borne by the volunteer or intern. These costs, however, may be reimbursed to the individual from a grant budget, if specified in the proposal. In order to accomplish this have the volunteer or intern submit receipts for the fingerprinting and TB test. Project staff would then submit a check request form on behalf of the individual for the costs incurred.

Paying Project Staff

There are a number of steps needed to pay staff charged to a grant project.

- 1. Status Change Form: A Status Change Form (SCF) needs to be completed for all staff who will be charged to a grant project. There are two types of forms: an Academic Administrators and Faculty Status Change Form (ASCF), and a Classified Status Change Form (CSCF). For full-time and ongoing employees the percentage of their time to be charged to a grant account is listed on the Status Change Form, and payroll uses that information to pay them on a monthly basis: on the 10th and the 25th of each month.
- Time Card: Has to be completed by all hourly employees, classified or academic. The pay period for hourly work is from the 11th day of one month to the 10th day of the following month. For example, April 11 May 10 is one hourly pay period. Employees complete their time cards and submit them to their supervisors.
- 3. Payroll Time Sheet: A Time Sheet is completed and submitted to payroll in order to pay hourly staff. All of the hourly work submitted on time cards can be compiled on one sheet for the relevant pay period. The administrator needs to sign the Payroll Time Sheet and then it is submitted to Payroll. Please check Payroll's website or contact them for submission due dates.

Website: go to <u>www.rsccd.edu</u> > from the Departments menu at the top of the screen select Payroll

https://www.rsccd.edu/Departments/Payroll/Pages/Payroll.aspx

Purchasing

The RSCCD Purchasing Department has the authority to purchase and/or lease supplies, equipment, and services. Purchases made by an individual not assigned the authority to do so will incur a personal obligation to the vendor. Contact the Purchasing Department for information and assistance with district purchasing processes for:

- Purchase Requisitions
- Bidding
- Receiving, distribution, and inventory
- Contracting with Vendors or Partners (Sub-recipients)
- Independent Contractor (Consultant)/Guest Lecturer

Purchasing Processes and Procedures

Common areas related to purchasing for grant projects are briefly addressed below. Please refer to the Purchasing Department website for more detailed information on processes, timelines and guidelines.

Website: Go to <u>www.rsccd.edu</u> > select Purchasing from the menu at the top of the screen

Buying supplies, services or equipment

To buy supplies, services, and equipment needed for their projects, project directors or their staff will need to input purchase requisitions (PRs) into Datatel, the district's data and accounting system.

Prior to entering the requisitions, the budget should be reviewed to make sure there is money in the account(s) that will be charged. Once the PRs are entered into Datatel, they are assigned a PR number, and placed on hold until approved by the department administrator. Once approved, the PRs will be assigned a purchase order (PO) number and will be processed by Purchasing. Allow 1-3 weeks after requisitions are marked "approved" for purchasing staff to complete the order.

Project directors can help expedite the purchasing process by doing the following:

- Use the correct object code and account number. Before completing the PR, the project director should
 contact Purchasing to check that the object code(s) that will be used are correct. Note: if you use an
 incorrect object code your purchase will be delayed.
- Make sure there are enough funds in the account(s) to be charged to cover the item(s) to be purchased. The Datatel system automatically checks the balance(s) in the account(s) to be charged. If there are insufficient funds for the purchase, Datatel will not let you complete the requisition. If there is not enough money in the account, funds will need to be transferred from one account to the other via a budget change form. If you are not sure whether this change is allowable per your grant requirements or your budget does not have an account number for the item, contact Resource Development. After the

account is created, you will need to complete a budget change form to move money from an existing account into the new account.

- For equipment and software purchases, confer with Information Technology Services (ITS) before submitting your PR, because of district standardization practices and installation considerations.
- Make sure the PR has the correct item number, quantity, description, and calculate the total cost (unit cost, shipping & handling, and taxes). If you know the vendor website or have an order form for the product, send a copy to purchasing and write the PR number on the copy.
- Make purchases early in the grant period. The nature, volume, and timing of requests will determine whether orders will be delivered on time. Purchasing sends emails to all district employees that specify purchasing cut-off dates well in advance of spring deadlines.

Bidding

In general, purchases of equipment, supplies, and services (other than public works) costing \$15,000 or more will require three competitive quotes. Some grants may have lower dollar amounts that require a competitive bid. The bid process takes longer than the normal purchasing process. Project directors should contact the Purchasing Department as early as possible to begin the bid process. The person in the Purchasing Department responsible for purchasing your specific item should be contacted directly.

Independent Contractors

Somewhat different from a vendor, an independent contractor is usually an individual or company that provides a service rather than a product like a vendor. When considering whether to hire an independent contractor, one should first consider whether the service or expertise needed is already available at RSCCD. If it is not, it is the project director's responsibility to identify the independent contractor most qualified to meet the project's needs.

Independent contractor requests are handled by the Purchasing Department. Project directors should contact Purchasing for assistance with completing the *Independent Contractor/Guest Lecturer Certification Packet*. The hiring of all independent contractors must be board approved, and those with fees of \$15,000 or more must be board approved **before** their date(s) of service. Once you have all of the completed and signed forms, forward the entire packet to the Human Resources Department for approval. Human Resources will then forward the packet to the Purchasing Department for processing. The Purchasing Department presents these to the Board.

Travel and Conferences

Staff that will be traveling should complete RSCCD conference request forms, and have them approved (signed), before making financial commitments, such as purchasing airline tickets, and, always, **before** traveling. Conference request forms (fillable PDFs) can be obtained from Accounts Payable, most division offices, and is available online on the intranet at www.rsccd.edu. Travelers may request up to 75% of the total estimated cost in advance of travel. Checks to pay for registration fees and hotel costs may be requested as part of the advance. Purchase requisitions may be completed to get purchase orders to buy airline tickets through a district authorized travel agent (call Purchasing Department). Once a conference request is approved, and advances requested, the

traveler (or his or her department staff) keeps the form. Once travel is completed, the forms are submitted to Accounts Payable for reimbursement.

In order for the district to pay for the travel, including reimbursement to the individual for out-of-pocket expenses, all travelers must submit copies of original receipts for airline tickets, hotels, conference registration, meals, parking, taxi/shuttle, and other expenses for which they want to be reimbursed. Allow two weeks for checks to be processed.

For local travel using one's own vehicle, mileage request forms are to be filled out for reimbursement. Mileage request forms document the number of miles, destination and reason for travel, and are important back-up documents for grants. When travel is completed, conference request and mileage request forms should be completed and submitted as instructed on the form, and with appropriate signatures and documentation, to Accounts Payable. For more information please visit the Accounts Payable website.

Website: Go to <u>www.rsccd.edu</u> > select Business Operations & Fiscal Services from the Departments menu at the top of the screen > select Accounts Payable from the menu on the left side of the screen.

Contractors (e.g., Vendors) and Subrecipients (e.g., Partners) for Grant Projects

Often a grant awarded to RSCCD will require the services or participation of an outside agency or company. These services will either be provided as a contractor to the district or as a subrecipient. There are different procedures for working with contractors and subrecipients.

How to Determine if an Organization is a Contractor or a Subrecipient

Whether an organization is a contractor or a subrecipient is primarily determined by the nature of the organization's role in the project. The table below provides guidelines to determine whether an organization should be considered a contractor or a subrecipient based on federal OMB Uniform Guidelines.

Subrecipient Characteristics (200.330a)	Contractor Characteristics (200.33b)
Determines who is eligible to participate in a	Provides good and services within normal
program	business operations
Has its performance measured against whether	Provides similar goods or services to many
the objectives of the program are met	different purchasers
Is responsible for programmatic decision making	Operates in a competitive environment
Is responsible for complying with program	Provides goods or services that are ancillary to
requirements	the operation of the federal program
Uses grant funds to carry out a program as	Is not subject to compliance requirements of the
compared to providing goods and services	program

Securing a Contractor

Project directors must work with the Purchasing Department to initiate agreements with contractors.

Working with a Subrecipient

Grant sub-award agreements are the means to work with organizations that will serve as subrecipients in the project. The Resource Development Department develops grant sub-award agreements, facilitates review and approval by the project administrator and director and partner organization, prepares the final agreement for approval by RSCCD's Board of Trustees, secures original signatures on copies of the agreement after it is approved, and mails the agreements to the partners with instructions. Once a signed copy of the agreement is returned from the partner, the Project Director or staff would submit a purchase requisition for the partner.

Budget Management

Cost Principles

Organizations that receive grants are responsible for ensuring that grant funds are properly used. To ensure this, the government has established what are known as "cost principles," which are overall guiding rules about costs charged to a grant that are allowable, allocable, and reasonable without supplanting under the relevant agency's cost principles. Following are the definitions of these basic "cost principles."

Allowable Costs

Allowable costs are those categories of costs that a funding agency allows to be charged to a grant. Individual funding agencies define what are and are not allowable costs. For example, in some grants equipment may be purchased, while in other grants it may not. Allowable costs are identified in the RFA/RFP, OMB Circular A-21, Code of Federal Regulations, EDGAR, and other applicable project manuals supplied by funding agencies.

Allocable Costs

Allocable costs are, basically, the direct costs to the grant that can be documented. A cost is allocable to a grant if (a) it is incurred solely to advance the work under the grant; (b) it benefits both the grant and the institution in proportions that can be approximated through use of reasonable methods; and (c) it is necessary to the overall operation of the institution, and in light of principles in OMB Circulars, can be assigned in part to the grant. Allocability for personnel can be documented through properly signed Status Change forms, time sheets, and time and effort reports; sign-in sheets for attendance at meetings, workshops, and seminars; faculty load sheets; and invoices from consultants that specify time and effort committed during the billed time period. Allocability for non-personnel items are documented through purchase orders; conference request/claim forms with receipts; mileage claims; check requests with receipts; fully-executed consulting and sub-award agreements; invoices; and district-generated expenditure reports.

Reasonable Costs

Costs are considered reasonable if they do not exceed that which would be incurred by a prudent person under similar circumstances. Reasonableness can be documented through use of district negotiated salary schedules

and benefit rates; price lists published by vendors; quote/contract between district and vendors/contractors/consultants for products and services; district approved reimbursement levels (mileage); and sales receipts. Consistency in estimating, accumulating, and reporting costs can also be evidence of reasonableness.

Supplanting

Supplanting is using grant funds to pay for a position or activity that has previously been funded from the College's regular budget. This is not allowed by many funding agencies and can result in cancellation of a grant award and repayment of all expended funds. In addition, it may also result in penalties being paid by the district as well as jeopardizing current and future funding for other grant programs. This issue should be discussed when initially developing a budget for a grant proposal, but may also arise during a project when considering changes in a project.

Monitoring Expenditures

Project directors are primarily responsible for monitoring their own budgets. Project directors and staff can check budget balances and expenditures through COLLEAGUE/Datatel, the district's data and accounting system. Directors should review expenditures monthly, at a minimum, and more frequently if the project has a lot of activity. Training on how to use COLLEAGUE/Datatel to view and download grant-funded budget reports is provided by the Fiscal Department (call Sheena Tran 480-7588). Project directors should review these reports carefully and reconcile them with their own records. Resource Development staff are available to help guide new directors through the reports, which may seem confusing at first. Discrepancies and errors that cannot be corrected by the project staff should be reported to the Resource Development staff who will analyze the problem and recommend a solution. Meetings among the project director and staff, resource development staff, and the project accountant can be requested by any of the parties at anytime to address larger scale or persistent problems.

Making Changes to the Budget

Changes can be made to grant project budgets within the guidelines established by the grant terms and conditions and regulations. There are three primary means of changing a budget: creating new accounts, moving funds between accounts, and transferring expenditures in to or out of a grant budget.

Creating New Accounts

Line-time accounts in a budget are the means whereby project directors and staff make expenditures to perform the work of the project. Each account represents a particular cost. Directors or staff can check Datatel to determine if the project budget already has the account needed by running a COAR report in Datatel. If the budget does not have the account, the director or approved staff member must contact Resource Development (email preferred) to request the account. Resource Development staff will review the request for compliance with grant terms and conditions, and, if allowed, will submit an account request to the Accounting Department.

Moving Funds in a Project Budget

Project Directors will need to make decisions on how to allocate the funds in their budgets to perform the work of their project. Given the changes that occur from when a project is planned (grant proposal) to the realities confronted when a project is implemented in the real-world there will usually be a need to move funds around in a budget to accommodate these changes.

A Budget Change Form is the means to move funds between accounts within a project budget. [NOTE: Funds cannot be moved between grant projects.] The form is used to reallocate funds from one account to another, and requires an explanation of the reason for the move. The form must be signed by the project director (or project administrator if the project director is a faculty or classified member). Project directors should keep a copy of the form and forward it to Resource Development. The Resource Development staff member assigned to the project will review the budget change form to confirm that it is allowable and compliant with grant terms and conditions, and will sign for approval and forward the form to Accounting. If the form is not in compliance, it will be returned to the project director or staff member with an explanation on why it was rejected. Directors and program staff should allow 2-5 days for processing, and use Datatel to verify that the changes have been posted.

Transferring Expenditures

There are times when a director may need to transfer expenditures into or out of a project budget, due to incorrect charges or to manage funds. The Project Director/staff would complete a Transfer of Expenditures Form to move an expenditure out of a project budget into another budget. The Accountant assigned to the project can advise project directors on how to complete transfer of expenditure forms, because exact amounts from payroll or Datatel reports need to be used. A short written justification must be provided to document why the transfer was made. The project director signs the form as the requestor and obtains signatures from a project administrator, service area president, or vice chancellor, or, for amounts over \$20,000, the Chancellor. The project director then forwards the form to Accounting for final approval.

Getting Reimbursed for Expenses

Sometimes a project director will need to purchase something too quickly to go through the purchasing process, or may want to order something from a vendor that doesn't accept purchase orders. While not encouraged, project directors are allowed to make these purchases and request reimbursement for them, as long as they are allowable grant expenses and they submit original receipts. This process should not be used for large dollar purchases, for items that must be tagged in the inventory system, nor used as a way to circumvent the purchasing process. Other employees and students can also be reimbursed in this way under special circumstances. Check requests are closely monitored by Accounts Payable.

For reimbursement, the project director should submit a Check Request Form to Accounts Payable. The check request form must be submitted with correct account numbers from the grant budget, original receipts, and required signatures of approval, which are indicated on the form. Project directors need to be aware that there are deadlines at the end of the year for submitting cash reimbursement requests during the current fiscal year.

Program and Budget Modifications

Since grant proposals are projected work plans and proposal budgets are estimates of what will be needed to implement the plan, it is not unusual for things to change once work gets underway. Funding agencies understand this and often allow grant recipients to make changes, to varying degrees, without requesting their approval. Further, grant contracts specify the types of changes that can be made with or without prior approval by the funder. Project directors will be informed about the budget modification terms at the beginning of the program to ensure they know them at the start of a grant.

If a project director wants to make a change that requires prior approval from the funding agency, he or she should contact the Director of Grants or Resource Development Coordinator (ext. 7463) assigned to the project. They will jointly discuss the procedure for requesting the change. In some cases, Resource Development staff may contact, or advise the project director to contact, the program officer at the agency to determine the procedure and discuss the possibility of the change. Email is a good way to initially contact the program officer about a change. While their response is not the official response, a copy of the email message in the project file is good back-up to document conversations about the change.

The grant contract normally details procedures to follow. It is important to follow the exact procedures since grant contracts are legal documents and cannot be altered without official written approval. The Resource Development staff assigned to your project is your contact for completing the necessary forms. He/she will walk you through the forms and assist in calculating the correct budget changes. The project director is responsible for the narrative portion in which the justification for the changes and description of the proposed changes are included. Resource Development staff will be responsible for compiling the final document, getting the signatures, and mailing the request.

Agency personnel will deliberate and officially approve or deny changes in writing. **No program changes may be made until official written approval is obtained**. This may take several weeks, so it is important to submit the request for changes as early as possible. The original approval letter is to be sent to Resource Development. Project Directors are to maintain a copy in their project files. Resource Development will send a copy to the Accounting Department.

Project Extensions

If there are legitimate circumstances that prevent completion of a grant project within the time frame of the grant, sometimes it is possible to get a "no-cost extension" from a funding agency. "No-cost" indicates that no additional funds are awarded, but the agency will let you use existing, unexpended grant funds for a longer period, which they will stipulate. Usually, extensions are for a year. As with program modifications, no-cost extensions must be requested by the Project Director in writing and approved in writing by the funding agency. Extension requests usually must be submitted 90 days before the grant expires. Resource Development staff will help you prepare project extension requests. It is illegal to expend funds after an official grant termination unless permission has been sought by the Project Director and approved by the funding agency.

Discuss the extension with the Director of Grants or Resource Development Coordinator. In cooperation with the Resource Development Department, contact the program officer at the agency to determine the

procedure and to discuss the possibility of the extension. Email is a good way to initially contact the program officer about an extension. While their response is not the official response, a copy of the email in the project file is good backup to document conversations about the extension.

Carryover of Funds

"Carryover" refers to the remaining balance of funds in a project at the end of one fiscal year that will be available in the next fiscal year.

For example: In the first year of a two-year grant project, only \$25,000 out of the \$100,000 grant award is spent by June 30^{th} , the end of the Fiscal Year. Consequently, there would be \$75,000 of carryover that would be placed into a budget for the subsequent Fiscal Year to continue to operate the project until the end date for the grant.

Carryover of funds is only allowed if the term of the grant extends into the next fiscal year. If a grant project term ends on June 30th, then there would not be a carryover of funds into the next fiscal year, even if there was a balance remaining. However, if the project director obtains approval for an extension of the project term to end in the next fiscal year, then a carryover budget could be created.

Carryovers are required for projects whose term crosses fiscal years. RSCCD's fiscal year is from July 1st-June 30th.

For example: A project awarded in October 2010 that has a grant term of October 1^{st} – September 30^{th} would cross two fiscal years. October 1^{st} – June 30^{th} the budget would be in fiscal year 2010/2011, but the remainder of the term, July 1^{st} – September 30^{th} would be in fiscal year 2011/2012.

Sometimes multi-year grants are given the entire amount up front, and so there would be a carryover of the balance of funds into each new fiscal year, until the grant ends.

Handling Checks Received from the Funding Agency

Today, most funding agencies use electronic wire transfers to provide funding for grants. The Accounting Department is responsible for set-up of the wire transfer, communication with the bank, and transfer of funds to the county. Occasionally, an agency sends a check to the project director. If this occurs, immediately deliver it personally to Accounts Receivable in the Accounting Department.

Program Management

Signing Legal Grants and Contract Documents

Project directors <u>must not</u> sign any documents that commit the college and district to any financial or programmatic activity. Nor, in most cases, should anyone at the colleges sign these documents. Please forward grant and contract agreements from funding agencies to the Resource Development Department for handling. Sometimes these agreements are "disguised" as letters to the president. Please send all original award letters/documents to Resource Development.

Time and Effort Reporting

Each month, Accounting runs time-and-effort report forms (i.e., Categorical Time Sheets) for all employees charged to project account(s), and send the forms to the project director monitoring the grant who then distributes them to the project staff members assigned to the project. The form includes the project account and the expected numbers of hours to be worked, based on the percentage of time assigned to the project listed on the status change form submitted for the employee. After completing the time-and-effort report form, the employee submits it to their administrator who has direct knowledge of the work assigned to the employee and their performance, and signs after-the-fact to verify that the stated hours are accurate and were for work performed to support the project. In signing the form the administrator is also certifying that the appropriate procedures have been followed, and that the report is accurate and complete, as summarized in the signature statement included on all time-and-effort reports:

A Categorical Time Sheet has been sent to the above employee(s) who work in special projects under your direction. Please use this list to verify the correct account numbers and percents. After you determine that these accounts and percents are correct, please sign the bottom of this form and return it to Accounting. If the information is not correct a status change form will need to be submitted. The Employee Time Reports reflect account number and percentage information on Status Change Forms that HR and Payroll have at the time payroll was processed. If there were subsequent Status Change Forms submitted, please make the necessary adjustment on the same time-and-effort report or use a blank form.

Time-and-Effort reports are one of the most important documentation procedures, as they document the personnel expenditures charged to grant or grant-related (i.e., match) budgets.

Monitoring Subrecipients

Project directors are primarily responsible for ensuring that agencies receiving the district's grant funds perform as required by the grant and sub-award agreement. The project director is responsible for collecting reports and work products per timelines detailed in the sub-award agreement(s). As soon as possible, the project director should review the agreement with the assigned responsible person at the partner agency to describe the types of records that should be kept by the agency. Project directors should make a schedule for monitoring sub-recipient activities and keep records of all monitoring activities.

Monitoring should include, at minimum: a) monthly conversations with the assigned responsible person at the partner agency about their progress; b) review of partner's invoices and supportive financial documents upon submission to the Accounting Department; and c) immediate review of partner's reports and work products submitted as part of the project work plan and objectives. It is recommended that the project director visit the partner agency or location of project activities at least once per year, and more if warranted by the extensive nature of activities or if the agency is having difficulty meeting their commitments.

Amendments to Sub-award Agreements

The same processing requirements that apply to developing and approving grant sub-award agreements, also apply to amendments. An amendment to a sub-award agreement can be used to increase or decrease the duration of the agreement, change the scope of work to be completed under the agreement, and increase or decrease the amount of funds committed in the agreement. Approval from the funding agency to change a sub-award agreement may be required if the scope of activities or dollar amounts change. Most funding agencies provide instructions on when amendments are necessary and the procedures for processing amendments with them. Amendments to sub-award agreements must be processed through the Resource Development and must be approved by the Board. The Resource Development staff will assist project directors to develop and process amendments to subcontracts.

Monitoring Vendors

The project director is responsible for ensuring that the procurement, receipt, and payment for goods and services comply with laws, regulations, and the provisions of the grant, district, state, and, if applicable, federal government. Compliance can be assured by following district purchasing procedures and by being familiar with the government procurement regulations governing the project.

A sub-award agreement will be developed by Resource Development, and Board approved, which will describe in detail the expectations and requirements of the partner for a grant project. The agreement will include information on processes and procedures, requirements and documentation to receive payment, as well as timelines.

Partners will need to keep all records that pertain to the project for at least three years after the end date of the project, in accordance with RSCCD's policies and regulations (See Administrative Regulations AR 3105, Records Retention). If the funding agency requires that project records be kept for a longer period after the end date of the project, partner will have to comply and keep those records for the time period declared by the funding agency. Also, all the partner's records that pertain to the project must be made available if an audit is called for internally or externally.

Site Visits and Audits

Funding agencies may conduct site visits to monitor projects progress and compliance with the grant terms and regulations. These may be informal or more structured. If there is to be a monitoring visit, please inform the Director of Grants and contact the project administrator and other relevant managers to coordinate such a visit.

Agencies will send a letter or instructions to guide the project in preparing for the site visit or audit. These instructions should be forwarded to Resource Development as soon as it is received, in order for the department to provide advisement and contribute to the preparation effort.

There are usually two aspects to a site visit or audit by the funding agency: 1) program and 2) fiscal management.

Program review will consider such things as planned activities were implemented on time and effectively, participant eligibility documentation, progress toward objectives, etc. Issues of confidentiality may preclude inclusion of specific information in general program files. For example, if the grant targets individuals with

disabilities, the documentation of the disability should be kept in a separate file. Should documentation be needed for audit purposes, permission to disclose information must be obtained from the individual and kept in the files along with the location of the documentation.

Fiscal management review will consider whether the documentation for expenditures is consistent, whether the actual expenditures correspond to the back-up documentation, and whether expenditures are allowable. Discrepancies between forms and paperwork to make expenditures and actual expenditures, or significant deviation from the approved budget or beyond allowable budget revision limits, need to be continually monitored and corrected to ensure that no findings result form a site visit or audit. This monitoring is the responsibility of the project director, with support provided by Resource Development and Accounting.

Annual Fiscal Audits

According to federal and state guidelines, educational institutions are responsible for initiating annual audits of federally sponsored projects to address the adequacy of internal policies and procedures while verifying compliance with federal laws and regulations, determining compliance with the general requirements, and assuring compliance with specific requirements. To meet these guidelines, RSCCD conducts an annual, district-wide audit using the services of an outside certified public accounting firm. During the annual audit, all grants from which the district received \$500,000 or more in the fiscal year and a sample of the smaller grants are audited. In addition, a funding agency may conduct its own fiscal audit or request the district's auditor to conduct an audit on any given project.

For the most part, the district is responsible for maintaining the financial records that must be produced for an audit. To ensure successful audits, RSCCD maintains strict administrative and accounting controls, many of which are described in this handbook. Working with the accountant assigned to the grant-funded project, the project director should monitor budget expenditures on a continual basis. Expenditures must be documented following the district's procedures for personnel as well as for goods and services. Following these procedures will provide the necessary paper trail with appropriate approval signatures. Project directors must keep copies of purchase requisitions (PRs), status change forms, budget change forms, and transfer of expenditure forms, although Fiscal Services also keeps the originals of these forms. Most importantly, it is the project director's responsibility to adequately document (non-financial) project activities and work products. Program audits records are not kept by the district, but may be needed in the case of a fiscal audit, too.

Grant Close Out

Proper closeout of a grant-funded project is as important as the development of the project. Continuation requests and final reports will usually include a narrative description of the project accomplishment for each objective in the methodology. Included in the narrative will be an evaluation of project outcomes. Any objectives not accomplished during the funding period, as well as any changes to the programmatic component of the project, will require an explanation. Final reports are usually due 30 to 90 days after grant-funded project termination. Timely filing of reports may have an effect on future funding possibilities. The following areas of management are critical to the closeout of a project:

Budget

Personnel

- Purchasing
- Equipment
- Duplication of final reports
- Document storage

Project directors will be advised to submit status change forms to remove staff from project accounts at least a month before the grant ends, and to meet with their administrator or supervisor to determine where staff will be reassigned and to identify the accounts to complete the status change forms to add staff to their new assignments once the grant ends.

The project director is responsible for facilitating notification of termination of any personnel within the guidelines of the college. Availability of out-placement services would be an appropriate part of the closeout process. The California Code of Regulations in part requires that when an employee is laid off, or is placed on a leave of absence, or when an employee voluntarily resigns or takes a leave of absence for any reason, the supervisor will provide written notice of 1) his/her unemployment insurance benefits rights, 2) what action is being taken, and 3) the date of the action. Therefore, it is very important to submit a status change form each time a short-term person is terminated or resigns, and/or a part-time faculty member is not given an assignment for the following semester. Recognize that our failure to appropriately notify terminated and resigning employees may undermine their ability to avail themselves of unemployment insurance benefits. Official termination through the status change form is also necessary for the employee to access their PARS, CalPERS, or STRS funds upon separation from RSCCD.

Resource Development will notify all concerned individuals and departments of the termination of grant-funded projects. Resource Development will work with the project director to assure that all records, accounts, and reports are filed and closed out. The retention of records for grants and contracts is defined by RSCCD (AR-3105) and funding agency regulations and policies. All records should be retained for the longest period of time specified by RSCCD and/or the granting agency.

Evaluation

Implementing the Evaluation Plan

Almost every grant proposal includes an evaluation plan that describes how the project director will monitor progress of the project, determine if project objectives were met, and, finally, if the project was successful or unsuccessful and why.

Generally speaking, two types of evaluations are performed for grant projects: formative and summative. <u>Formative evaluation</u> occurs throughout the project and is used to determine the effectiveness of activities, obstacles, and progress toward objectives, in order to decide if adjustments/changes need to be made to make the program more successful. <u>Summative evaluation</u> is done at the end of the project to see if the project has been successful and if objectives have been achieved.

Data needs to be collected from the beginning of the project and throughout its implementation, in order for the project director to have relevant information to evaluate the project and identify factors that contribute to or impede its success. Consequently, a system for collecting and tracking data **must** be set-up at the beginning of the project.

To set-up the data collection and tracking system, the project director should review the evaluation plan in the grant proposal and consider the following questions . . .

- What information do I need to collect?
- How will data be collected? (e.g., surveys, class assessments, district/college research reports, etc.)
- Do I need assistance from ITS or the Research Department?
- Who will collect data and when?
- Do we have access to the data?
- When will data be reviewed to assist project decision-making?
- Am I supposed to hire an external evaluator?

Some grants require projects to hire external evaluators. Sometimes a project director decides to hire an external evaluator because a project requires a specialist or requires specific expertise. To hire an external evaluator, project directors will need to follow the Purchasing Department's process for hiring an independent contractor.

Resource development staff will meet with the project director at the start of the project to review the proposal's evaluation plan and discuss how it will be implemented. If the project will use an external evaluator, then that person should also be present at this meeting. Project directors need to ensure that the system of evaluation is maintained throughout the project, and should periodically review data at strategic intervals to determine if adjustments are needed.

Reporting

Time & Effort Reporting

RSCCD must be in compliance with OMB Circular A-21. OMB Circular A-21 requires any institution that receives federally funded projects, including projects funded by other entities whose funding can be traced back to the federal government, to establish and maintain an "after the fact" workload distribution system that accounts for salary costs with reasonable accuracy.

RSCCD uses "Time & Effort" reports and employee time sheets to comply with OMB Circular A-21. The purpose of Time & Effort reports is to provide documentation that the percentage of effort reported represents a reasonable distribution of how the employee devoted his/her time during the reporting period. Time & Effort reports are required for the following state and federally funded grant staff:

- Those who complete hourly time sheets.
- Those who work for more than one grant at the college.
- Those who work for the college full-time in addition to his/her grant position.
- Those who are paid with federal funds, but work in a non-grant capacity.
- Those hourly and full-time employees who work for one or more federally funded grants and/or work in a non-grant capacity.

Time & Effort report forms are sent to individuals charged to grant accounts on a monthly basis by the Accounting Department.

An employee charged to a grant project indicates the number of hours he or she worked on the project each day for the month, and signs the form and submits it to the supervisor for review and signature to confirm the employee's statement is accurate. In addition, the supervisor signs a separate certification form.

The Time & Effort report and certification forms are generated from a list of persons charged to grant project budgets as they appear in COLLEAGUE/Datatel. Therefore, and again, project directors need to keep up with status change paperwork to ensure people are charged correctly to accounts. Project directors are sent a list of people receiving the forms, and must ensure that each employee assigned to a grant project completes a Time & Effort report and submits it back to Accounting on a regular basis.

Project Reports

Federal, state, and private funding agencies require progress reports and/or final reports with accompanying expenditures statements. The number of reports required in a project or fiscal year varies by funding agency. At RSCCD, project directors are responsible for completing the narrative portion of reports and the Accounting Department completes the financial portion of reports. The project director may work with the Resource Development staff and accountant to ensure complete information goes into the interim and final reports.