

Grant Management

& COMPLIANCE HANDBOOK

Office of Institutional Advancement FRANK PHILLIPS COLLEGE | 1301 W. ROOSEVELT ST | BORGER, TX 79007 | FPCTX.EDU

Acknowledgements

Frank Phillips College's Grant Management Handbook was originally modeled on Harper College's <u>Grants Management Handbook</u>. The Frank Phillips College Grant Management Handbook has been customized and revised to conform to Frank Phillips College business processes and to meet the needs of its users.





Frank Phillips College Institutional Advancement

Dear Colleague,

Congratulations, the college has received a grant award that you will be managing! Grants and effective project management are important for Frank Phillips College and your dedication and commitment to achieving positive outcomes through grants awarded to the college is a great contribution to the students and communities we serve.

The Advancement Office has developed this Grant Management Handbook to provide guidance to personnel involved in the management and implementation of grants, particularly Project Directors and Financial Managers. This handbook is a comprehensive resource that aligns with current federal guidelines for grants, as well as other applicable local policies and procedures.

This resource will guide you during the grant from the initial steps to close out. We encourage you to access this handbook frequently as a reference tool as you manage and implement the grant and contractual agreement with the funding agency. Should questions arise, you will be able to find quick answers on a variety of topics in this handbook. Advancement staff also provide training as requested/required and post-award technical assistant for the PD and FM of grants and contracts. The Grant Management Handbook, other helpful resources, and information are posted to our webpage at www.fpctx.edu/grant-development

While this handbook will serve as a reference throughout the grant period, please contact the appropriate person listed below if questions arise about grant management, including any compliance, budgetary, or reporting questions.

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It is my hope that all of those involved with grants will find this document useful. Thank you for your commitment to effective grant management and compliance!

With Plainsmen Pride,

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Grant Management Handbook

Section 1: Roles and Responsibilities for Grants

During the development, implementation, and management of projects, the primary offices that may be involved are: College President, Executive Vice President for Academic Affairs (EVPAA), Vice President of Administrative Services / Chief Financial Officer (VPAS/CFO), the appropriate Provost or Dean, and the Associate Vice President for Institutional Research (AVPIR). The primary individual responsible for coordinating with all of these offices is the Project Director. This individual is also responsible for facilitating communication about the project, soliciting support from the appropriate offices when needed, and participating in regularly scheduled grants compliance meetings with Advancement staff. The President, or a designee in writing, is the only person who can commit the College to receive and use grant funds.

Institutional Advancement

The Frank Phillips College Director of Development, Jennifer McDaniel, is on staff to help FPC faculty and staff identify potential funding sources, grant programs, and opportunities for FPC programs and activities; hone strategies for grant consideration; write and submit effective grant applications; and assist in managing the necessary reporting processes.

For any questions about grants or to request more information about grant writing assistance, email Jennifer McDaniel.

The Advancement Office will support, guide, and advise faculty and staff through the full life cycle of grants from pre-award to post-award to closeout.

Pre-Award/Grant Development Responsibilities

- 1. Provides information regarding potential funders and funding agencies
- 2. Assists faculty and staff in transforming an idea into a grant proposal.
- 3. Facilitates the mechanics of the planning process of proposal development.
- 4. Convenes the appropriate group of individuals to develop and write grant proposals.
- 5. Prepares the proposal and assists in budget development.
- 6. Provides information about the College and community to assist in the application of statistical data to support grant proposal ideas and solutions.
- 7. Reviews and edits content submitted by the content experts and project staff and reviews the proposal budget.
- 8. Coordinates final packaging of proposal and submits the final proposal to the funder.
- 9. Provides grant management workshops to interested faculty and staff.

Post-Award Grants Management and Compliance

- 1. Processes award documents, conducts negotiations, and drafts sub-agreements, MOUs, and similar documents.
- 2. Reviews grants for general compliance and oversight.
- 3. Assists with analyzing, interpreting, and applying Federal, State, and local government statutes, OMB Guidance, CFR, private funders' requirements, and other regulations for grant administration, and implements related College processes.

- 4. Serves as a resource for staff and project directors during the project implementation process to focus on allowable expenditures and the project budget.
- 5. Monitors the budget for proper use of funds, and ensures compliance with agency requirements regarding purchasing regulations, equipment inventory, and closing documents.
- 6. Works with the Business Office to coordinate reporting, audit responses, time and effort reporting, and other grant-related financial activities.
- 7. Provides oversight to facilitate the preparation and submission of reports and documentation required by the funder.
- 8. Directly assists with the formulation and implementation of College policies and procedures as they affect the administration of grant projects.
- 9. Conducts routine monitoring meetings with project directors to review financial and performance activities and provides recommendations for adjusting spending, when needed.

Business Office

- 1. Provides post-award administration support for grants, financial reporting, financial record maintenance, time and effort reporting, and preparation of monthly, quarterly, and annual financial reports.
- 2. Provides cash management support, including preparation of reimbursement requests and draw down of funds.
- 3. Ensures that grant funds are expended in compliance with the agency regulations or funder requirements.

Grant Project Director

The primary individual responsible for the day-to-day management of the grant throughout the grant period is the Project Director. Keys to effective and efficient grant management are planning, allowing for time needed to complete requests, addressing issues as early as possible, and maintaining complete, auditable records. The Project Director supervises the daily operations of the grant, including:

- 1. Managing the budget
 - a. Responsible for reconciling quarterly budget reports in collaboration with Advancement staff and the Business Office.
 - b. Monitoring the budget monthly to compare percentage of time elapsed in grant period with the percentage of total funds spent to date.
- 2. Purchasing with grant funds
 - a. Ensuring purchasing requests adhere to College policies and procedures and to federal, state, or funder requirements and completing the <u>Purchasing Checklist and Bid</u> <u>Summary Form</u> when applicable.
 - b. Ensuring grant-funded positions are paid in accordance with the grant requirements and standard College payroll practices and processes and hired in accordance with College hiring practices.
- 3. Closing out the project and evaluation
 - Preparing final reports for close out of the grant for submission to the funding agency and the Advancement Office within 45 to 90 days after the project ends. (Reminder: Not completing and submitting reports timely may have an impact on future funding.)
 - b. Ensuring proper close out has been completed using the Grant Closeout Checklist.

Section 2: Post-Award Processes and Procedures

Once a grant is awarded, the project should begin operations immediately. Be sure to allow for the needed time to begin working on defining grant activities, establishing timelines for milestones and deliverables, determining the reporting schedule, and understanding how the funds will be used within the guidelines of the funding agency/grantor.

Award Letter and Contract Processing

Funding agencies generally inform the person who is listed on the grant proposal as the lead contact person about a new or continuing grant award. Do not assume that the Advancement Office has been informed of the award. Many times, there are time-sensitive actions that need to be taken. Please notify the Advancement Office as soon as possible upon receiving an award letter.

Negotiating the Award

In some instances, a program officer from the funding agency may request additional information or clarification on a project or contact the lead person to discuss budget adjustments or required revisions. If you receive any communications from the funding agency, inform the Advancement Office immediately. Advancement, as the primary point of contact with all funding agencies and organizations, will negotiate the award to include negotiating the grant agreement and preparing materials requested by the program officer. The Advancement Office staff has extensive experience in working with a variety of grant programs, funding agencies, and foundations which will be helpful in the efforts to come to an agreement with the program officer.

Executing the Grant Contract

Please note that grant contracts may only be signed by the College President, or an individual designated by the president. Grant contacts are legal agreements between the College and the funding agency or organization that holds the College accountable and responsible for delivering the outcomes set forth in the contract and for managing all grant funds appropriately.

The Advancement Office will coordinate the review and approval of contact language. Upon approval of the contract language, the Advancement Office will facilitate the signature process to fully execute the grant contract. The Advancement Office will then distribute a copy of the fully executed grant contact and budget to the Project Director and Business Office for processing.

Announcing the Award

Grant awards and the projects they support are often announced publicly in a press release. The grant contract generally defines how the funding agency wishes to be recognized and any restrictions that apply if a press release is issued by the College. The Advancement Office will work with the Project Director to initiate a press release in accordance with funder requirements and coordinate the communication with Director of RAM. The grant award and project may also be announced or recognized through College publications such as social media or the website. It is important to note that the message should focus on the work of the project and those who will benefit as opposed to the amount of the grant award.

Grant Award Kick-Off Meeting

Within two weeks of notice of award, the Advancement Office will schedule a grant award kick-off meeting with administrative, fiscal, and program staff who will be involved in the grant. This meeting is

an opportunity for the Project Director and project team to ask questions and gain clarification on any and all aspects of project implementation.

The Project Director should become extremely familiar with the grant contract, project timelines and performance objectives, budget, and all requirements referenced in the grant award documents. We do not want to inadvertently fail to comply with grant requirements because we did not take the time to read and understand them. The award documents typically include specific information and the terms and conditions regarding allowable and unallowable costs and activities, reporting requirements, and situations that would require prior approval by the program officer.

At the kick-off meeting, the following grant project details will be reviewed:

- Specific requirements of the funding agency/organizations
- Specific next steps and timelines for project implementation and planned activities
- Best practices for establishing a recordkeeping system
- How to locate and submit Time and Effort reporting, as applicable
- Issues, policies, and procedures pertaining to budget, including equipment and supply purchases, contracted services, consultants, and subcontracting, as applicable
- Expectations regarding reporting requirements and due dates
- Any other issues of concern

Starting the Grant File

The official master grant file is maintained by the Advancement Office. This file should include all administrative documents associated with applying for, administration of, and closeout of the grant contract as well as any documents necessary for recordkeeping and audit purposes. A duplicate working grant file should be maintained by the Project Director. For each new grant-funded project, an electronic and hard-copy file will be maintained that includes the following documentation:

- Original Notice of Funding Opportunity or Request for Proposals
- Program regulations and guidelines
- Original proposal submission documents
- Final revised proposal and budget, if amended
- Original, fully-executed award documents and amendments or approvals
- Memorandum of Understanding with partners, if applicable
- In-kind, matching, and cost-sharing commitments included in budget
- Project timeline, implementation timeline, or work plan from original proposal
- Grant correspondence with the funding agency
- Sub-grantee monitoring reports and other sub-grantee records, if applicable
- Participant files
- Audit reports
- Program monitoring and evaluation reports
- Progress and financial reports
- Close-out documents

The Business Office will maintain the following documentation for grant files:

- Invoices and copies of receipts for purchases made with grant funds
- Time and effort reporting documents

Section 3: Implementation of Grant Project

Applying Best Practices

The implementation phase is the longest phase of the grant lifecycle. By now, the Project Director and team has reviewed the approved activities, timelines, budget, and evaluation plan, and has completed each of the steps already discussed in this handbook. This section provides best practices for managing the various aspects of project implementation.

Remember to:

- ✓ Verify that all grant project files are current and complete
- ✓ Review budget status
- ✓ Review allowable expenses before making a purchase or charging other expenses
- ✓ Review financial and progress report deadline and complete reports on time

Note: Progress and narrative reports are due to the Advancement Office a minimum of five (5) days before the due date. Use a monthly checklist to keep the project on track for success.

Establishing the Budget

Upon receipt of the notice of award, fully executed contract, and project budget, the CFO will set up the project's internal budget account based on the approved budget. This account will be used for any project-related purchases, grant personnel costs, and/or fund transfers. Most funding agencies use electronic wire transfers to credit grant accounts. This system will be set up by the CFO as defined in the award documents.

Once the budget is established, the CFO will review the fiscal management process with the Project Director. The CFO will then grant access to manage and approve budget expenditures for the grant in Anthology.

The Project Director should be very familiar with the budget, cost categories, and amount in each budget line, as approved by the funding agency. The Project Director is responsible for initiating and approving all direct charges to the project's budget.

Note: If the Project Director should receive a check payable to the College directly from the funder, it should be immediately delivered to the business office. Checks received in the name of the FPC Development Corporation should be forwarded to the VPAS/CFO for processing.

Managing the Budget

It is imperative that all grant funds are spent timely and prudently. Grant budget reports must be consistent with the project progress or narrative reports. If issues with project implementation arise that will impact the project budget, please contact the Advancement Office and the CFO as soon as possible and well in advance of report due dates.

As the project progresses, communicate periodically with the CFO to:

- Review the grant's financial status
- Receive help in interpreting budget reports
- Address questions about fiscal management
- Obtain information on cumulative expenses that may be needed when preparing a follow-on proposal for the project
- Receive assistance with payroll procedures and forms for grant-funded personnel
- Prepare financial reports for grant billings/draw down

Budget Line Items

The CFO will set up the grant budget in the College's accounting system. Funds will be allocated to accounts and budget line items in accordance with the approved budget. Common grant budget lines include:

Personnel

Salary and wages paid to employees working full or part time on program-related tasks for the grant (i.e. curriculum development, program implementation, training, etc.). Stipends (additional pay) for employees should be included in this line.

Benefits

Medical, dental, life insurance, and other fringe benefits related to faculty or staff working on grant programs. Professional development benefits are also included for personnel assigned to the grant fund. Federal award grants may include Teacher Retirement System of Texas (TRS) benefits based upon the current year state funding guidelines.

Travel & Meetings

Includes mileage, transportation, meals, and accommodations for faculty or staff attending meetings or training for program-related work. Conference registration fees are included in this category.

Supplies

Supplies are those items with a cost of less than \$500 per unit and a useful life of less than one year. Federal grants define the amount as less than \$5,000. Please refer to the GAN and the agencies grant guidelines.

Equipment

Equipment has a cost of more than \$500 per unit and a useful life of more than one year. Federal grants define the amount as greater than \$5,000.

Contractual Services

Contractual Services are those items provided by non-personnel or companies. Further detail on the different types of contractual services is included in the "Vendors vs. Independent Contractors vs. Sub-recipients" section, below.

Other Expenses

Other expenses may include participant support costs such as tuition waivers, or scholarships. Most costs should fit into one of the above categories if they are being directly charged to the grant. Please contact the Business Office for a full chart of accounts for a specific grant.

Expending Grant Funds

Allowable Expenditures

All costs directly related to the grant, including salary, fringe benefits, stipends, travel, supplies, equipment, printing, and marketing and outreach are eligible expenditures if they were included in the original budget approved by the funding agency. Allowable expenditures are allocable, allowable, reasonable, and necessary for accomplishing the objectives of the program as defined in approved grant award for implementing activities. There may be instances where the contract may have more restrictive terms than general funding guidelines (such as the Uniform Guidance or GATA). When rules do conflict, the most conservative rule applies to the spending limitation. FPC's institutional policies and procedures must always be followed for grant purchases and contracts. For any expense that may be questionable, you should contact the Advancement Office prior to committing the funds.

Common disallowed costs, include, but are not limited to:

- Salary for faculty not working directly on the grant (i.e. an adjunct filling in for faculty working on the grant)
- Alcohol
- Entertainment Costs (unless approved as programmatic by awarding agency)
- Lobbying
- Advertising (unless for grant personnel recruitment)
- Promotional items or "giveaways"
- Employee morale or student activity costs
- Commencement or convocation

Exceptions may be made if prior approval is obtained from the agency.

Approvals of Expenditures

Prior to expending funds, the Project Director should review the costs to ensure they are an allowable expense and directly relate to the grant objectives and are provided for in the grant budget. The Project Director should approve expenditures through GP's workflow systems (Human Resources, Purchasing or Accounts Payables) based upon their institutional authority. Evidence of approval should be part of the grant files for all expenditures.

Supplement vs. Supplant

Grant funds must supplement or add to, enhance, expand, increase, extend the programs and services offered with College funds. Grant funds are not permitted to be used to supplant (take the place of or replace) local funds used to offer those programs and services. Grant funds should INCREASE the overall amount of resources available to the Grantee. If an expense was previously paid for with College funds, it should not be charged to a grant subsequently unless it can be documented that state or local funds have been reduced/eliminated.

Documenting In-Kind, Cost Sharing, and Matching

Some funding agencies or grant programs require the grantee institution to demonstrate its financial commitment to the project, or the commitment of other funding sources. This is done by sharing the total project costs through matching or leveraged funds, cost sharing, or in-kind contributions. If

included in the grant proposal budget, these financial commitments become a binding requirement of the grant award and costs must be tracked and reported for compliance.

For all federal awards, any cost share, matching funds, or in-kind contributions must be accepted as part of the non-federal entity's cost sharing or matching when such contributions meet all of the following criteria:

- Verifiable from the non-federal entity's records;
- Not included as contributions for any other federal award;
- Necessary and reasonable for achieving project or program objectives;
- Not paid by the federal government, unless required; and
- Included in the approved budget.

The Project Director must work closely with the Advancement Office and CFO to ensure that in-kind, matching, or cost sharing funds are allocable, available, and properly documented. For example, funds cannot be used for match or cost sharing on multiple grants and federal funds cannot be matched with other federal funds. These commitments must be documented in a way that meets audit standards.

Grant Budget Revisions

The grant budget approved by the funding agency is a financial plan for achieving the desired outcomes of the grant project. Grant funds may only be expended within the cost categories and amounts identified in the approved grant budget. The approved budget constitutes part of a legal contract. Changes in planned project activities or scope of work may require budget modifications. Federal and state guidelines are usually flexible enough to allow minor (\leq 10%) line item variances without prior approval from the program officer. If a larger change is anticipated, contact the Advancement Office to discuss the changes before making any scope of work changes or spending funds outside of the approved budget.

The Advancement Office will work with the Project Director and CFO to determine if the funding agency guidelines allow for the proposed budget change. The Advancement Office may need to contact the program officer at the funding agency to discuss the change and to determine the appropriate forms or format for formally requesting the modification.

Upon receipt of the request, the funding agency will review and officially approve or disapprove the change in writing. No budget changes may be made until official, written notification is received. This process can take several weeks so it is important to make adjustments as early as possible. The revised budget and copies of the written approval will be maintained in the grant master file in the Advancement Office.

Purchasing

The Business Office has instituted an efficient and fair procurement process in accordance with federal and state procurement regulations and encourages the inclusion of all vendors and suppliers. For purchases of \$25,000 or more, a formal bid process is required. Responsibility and authority to make commitments for these purchases are assigned to the Business Office. For more information on purchasing procedures and processes, contact the Business Office or review the purchasing procedures section of the Employee Handbook.

Vendors vs. Independent Contractors vs. Sub-recipients

Most vendors are businesses, suppliers, contractors, or subcontractors who sell goods and services to the College through the purchase requisition process. All vendors interested in doing business with the College must send a W-9 to the Business Office. All vendors are subject to College purchasing policies.

Independent contractors (including consultants) are entities that receive a contract from FPC and provide goods and services under a procurement relationship within normal business operations. These contractors provide similar goods and services to many different purchasers and normally operate in a competitive environment. In the context of federal grant projects, independent contractors provide goods or services that are ancillary to the operation of a federal grant project and are not subject to compliance requirements of a federal program as a result of the agreement.

A sub-recipient is a non-federal entity that expends federal funds to carry out a part of a federal grant project's activities, as opposed to providing goods or services (as a contractor) for the benefit of the College. In a sub-recipient relationship, the College is considered a pass-through entity (i.e., federal funds are awarded to the College, which then provides part of those funds to the sub-recipient for performing grant work/activities). Different from vendor or contractor, a sub-recipient is a partner responsible for a portion of the grant's performance outcomes, and shares in the responsibility for programmatic decision making. In accordance with grant contracts, sub-recipients are responsible for compliance with applicable federal flow down clauses and program requirements.

A sub-recipient relationship is established through a sub-award agreement, a contract issued under a larger (prime) grant award for the commitment of specific services or project-related activities that are to be performed by the sub-recipient. Issuance of a sub-award under a federal prime award is subject to compliance with federal law, and all sub-awards are subject to the terms and conditions of the prime grant award and the College's purchasing policies. A sub-award does not include payments to a contractor or payments to an individual that is a beneficiary of the federal grant program.

Once the grant is awarded, the Project Director and the Advancement Office will discuss and determine which partners are eligible to receive federal assistance, and the Advancement Office will prepare a subaward agreement. This agreement will define the specifics of the grant work to be completed, the funding agency's terms and conditions, and College policies and procedures. Sub-awards are written to assign specific portions of the programmatic effort and the sub-recipient is responsible for managing the technical and administrative aspects of the agreement.

The Project Director, CFO, and Advancement Office will work closely to monitor whether:

- Federal and state awards are used for authorized purposes in compliance with laws, regulations (including OMB guidance), and the provisions of the grant contract.
- Costs are allowable, allocable, and reasonable.
- Performance goals are achieved.
- All grant project files are current.

Hiring Grant-Funded Personnel

Often, grant projects will include new positions. If new employees are to be hired for the project, the Project Director must follow the College's standard hiring process and procedures. Grant-funded personnel must be hired using the same procedures as nongrant personnel. For specific information

regarding the College's policies and procedures involved in developing and posting a position, and guidance on the selection and hiring process, please consult the HR & Benefits Coordinator.

For new positions, a job description must be created and sent to the HR & Benefits Coordinator for review and approval and to have a position classification and salary range assigned. The HR & Benefits Coordinator will finalize the Job Description and post the position.

Tracking Time and Effort

College and government policies require that all faculty or staff paid from and/or contributing effort to federally-funded and state-funded grants report and certify their time and effort (T&E) accordingly. When the College accepts federal or state funds, it agrees to this obligation as a condition of award.

Institutional records are required to verify direct and indirect cost activities related to grant-funded projects. In addition to submitting regular timesheets, it is required that a T&E Certification Form be completed by each faculty or staff who charges or contributes time to a grant project. This form provides a system of budgeted, planned, and assigned work activity that is incorporated into the official records of the College and must reasonably reflect only the activity for which the faculty or staff is compensated by the College.

The T&E Certification Form records the percentage of effort reported for a given period to substantiate the salaries and wages charged to the grant. It should be noted that effort documentation is not based on a 40-hour workweek. Instead, effort is calculated based on 100% of activities. Effort must be reported even if not paid from the grant budget. The grant-funded effort must also be allowable activities as defined in the grant contract. Inaccurately certifying effort can be viewed as fraud. Please be aware that recent noncompliance audit findings have resulted in multi-million-dollar fines at other large educational institutions.

Note: Contact the Advancement Office or CFO with questions about T&E reporting.

Risk, Compliance, and Sub-Award Management

Grant compliance is becoming increasingly important. Federal requirements have expanded for evaluation and monitoring of grant project outcomes, and increased scrutiny of risk management and financial accountability and transparency is codified in the federal Uniform Guidance regulations (i.e., OMB Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards in 2 CFR part 200).

The risk management cycle is a framework for continuous discovery, analysis, action, and improvement. Risk mitigation is taking appropriate action to address potential problems, including imposing the appropriate types and levels of requirements and providing appropriate types of monitoring and levels of technical assistance. Monitoring is the process followed to assess how well a grant is being implemented, achieving program objectives, and complying with requirements, terms, and conditions.

Grantees who allocate sub-awards of federal funds to sub-recipients as pass-through entities must:

- Assess the risk of sub-recipients;
- Maintain strong internal controls for managing sub-awards;
- Communicate with federal program staff and with sub-recipients;
- Document all activities; and

• Monitor sub-awards to ensure sub-recipients are spending grant funds appropriately and in compliance with the award and all regulations.

When monitoring sub-recipients, the pass-through entity must:

- Review reports required by the pass-through entity;
- Ensure sub-recipients take appropriate action on deficiencies identified through audits, on-site monitoring, and other reviews;
- Issue a management decision for single-audit findings pertaining to the federal award; and
- Verify audits of sub-awards.

Programmatic Changes

All programmatic changes must be discussed with the Advancement Office. The Advancement Office will contact the program officer to discuss the potential changes needed and complete the forms required by the funding agency to request a formal grant modification.

Personnel Changes

During the life of the grant it may be necessary to change grant-funded personnel, key personnel listed in the grant, or to adjust salary rates. Most funding agencies have established strict procedures for requesting prior approval of personnel changes which are incorporated into the terms and conditions of the grant contract. The Advancement Office will work with the Project Director and provide technical assistance in obtaining approval from the funding agency.

Changes in Project Scope

Substantive changes in the scope, objectives, or goals of a project, whether they impact the budget, typically require written approval from the funding agency's program officer. Some examples that would require written approval include changing a performance location, major changes in pedagogical methods, training activities, or monitoring plans. In most cases, a fully substantiated written justification for the changes will be required to request the changes. The Advancement Office is responsible for obtaining the written approval from the funding agency.

No-cost Extension

A no-cost extension is a request to extend the end date of the project beyond the previously approved end date and for which no additional funds are needed beyond what was originally awarded. The Project Director is responsible for knowing the deadline for submitting a no- cost extension request. Some programs do not allow no-cost extensions. Contact the Advancement Office to discuss the justification for the no-cost extension. Simply having remaining funds at the end of the grant period is not sufficient justification for a no-cost extension.

Required Reporting

Reporting requirements and due dates are specified in the grant contract and a reporting schedule is formalized at the kick-off meeting. Most funding agencies require monthly, quarterly, and/or annual progress and financial reporting. The Advancement Office will send reminders that report deadlines are approaching.

Note: The Project Director is responsible for preparing the initial drafts of reports as outlined in the grant contract.

Financial Reports

Financial reports are prepared by the CFO. The CFO will report on the budget expended to date and any in-kind or matching dollars. Financial reports will be reviewed and approved by the Project Director and the Advancement Office prior to submitting to the funding agency. Electronic submissions, through portals such as FedConnect, will be submitted by the CFO and all others will be submitted by the Advancement Office.

Narrative/Progress Reports

While the Project Director is responsible for preparing narrative reports, all reports must be reviewed by the Advancement Office prior to submission. Reports should be provided to the Advancement Office a minimum of five (5) working days prior to the due date to allow sufficient time for review.

Reports should conform to funding agency guidelines and use technical report writing standards. A report narrative usually requires responses to each of the proposed outcomes, including status updates on progress toward each grant activity, objective, and milestone. Outcomes that are not accomplished as scheduled during the reporting period should be clearly explained and any challenges should be described along with the solution.

Comments should be substantiated and fully supported by evaluation data, research, and statistics. The Project Director should work closely with the AVPIR to plan adequate time for collection and analysis of institutional project data, when needed for reports. Reports may also include charts, graphs, or other representations of data pertaining to students, participants, audience, and delivery of services.

Successfully prepare the narrative/progress reports by following these guidelines:

Follow all instructions

•Adhere to page limits, use funder formatting

•Ensure the specific questions of the funder are being answered

Review grant agreement guidelines

•Ensure each goal, objective, and activity is addressed

Explain any unexpected challenges, delays, or goals not fully achieved

•Include any corrective action taken to get back on track

Be clear, concise, and coherent

•Tie outcomes directly to project goals, objectives, and activities

Compliance Reviews

As stewards of external grant funds, the College must ensure that project implementation is on track. By monitoring the progress of grant activities and ensuring compliance with regulations, the College is working to secure strong relationships with funding agencies and other grant makers and focusing on accessing future funding opportunities.

The Advancement Office will schedule monthly or quarterly compliance reviews with project directors to review progress, both programmatically and financially, and discuss any issues or answer any questions.

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The frequency of these meetings will be determined based on the complexity of the grant and the grant management experience of the Project Director. These meetings allow the Advancement Office to support project directors in successfully managing their grant projects.

Additionally, annual file reviews will be conducted approximately one month prior to deadlines for final reports and an additional review will be conducted one month prior to deadlines for closeout reports, generally within 60-90 days after the grant contract end date.

Institutional Reporting

The Advancement Office provides monthly and annual reports to the College President, Vice President of Administrative Services, Board of Regents, and if applicable, the FPC Development Corporation Board of Directors. This report includes all current fiscal year grant awards, proposals pending, and proposals in development.

Section 4: Project Evaluation

Preparing for Project Evaluation

The evaluation is a key aspect of any project and evaluation plans becoming a heavily weighted criterion in grant proposals. The evaluation informs progress toward the achievement of objectives, the effectiveness of pedagogies and methods, and whether processes, strategies, or tactics require adjustment during the grant period. Expectations for rigor and quality of evaluation plans have increased in recent years across all funding agencies/organizations, so it is critical to keep in mind that evaluation must be an ongoing process throughout the life of the grant-funded project. The Project Director must be familiar with reporting schedules and be prepared to implement routine data collection and analysis as primary project activities. There are many approaches to project evaluation with the two most common being programmatic assessment and administrative assessment.

Programmatic assessment addresses the following questions:

- Is the project meeting the specific goals, objectives, and outcomes listed in the grant proposal?
- Is the project meeting the overall requirements and objectives of the grant program?
- Is the project programmatically compliant?

Administrative assessment addresses the following types of questions:

- Is the project meeting its milestones and deliverables?
- Do the expenditures correspond to the original budget?
- Are reports vouchers submitted correctly and on time?

Funding agencies may conduct several types of program monitoring activities, including but not limited to the following:

- **Basic mandatory monitoring** which includes the review of performance and progress reports and financial reports, along with final cumulative reports at closeout, vouchers and budget changes, annual A-133 audits, data submissions as requested, and ongoing communications with the grantee.
- **Periodic on-site monitoring** such as program reviews, process reviews, general onsite observations, file reviews, and programmatic and operational reviews.

The following list, while not all encompassing, describes the primary steps for ensuring a comprehensive project/program evaluation.

- 1. **Know the expectations of the project.** Review goals, objectives, strategies, milestones, deliverables, outcomes and work plans. Scrutinize the performance measures and indicators and carefully plan the tools and resources that will be used for collecting and storing data, when data collection will occur, and how the data will be analyzed.
- 2. **Contact the AVPIR to discuss the evaluation plans.** Project directors must work with AVPIR regardless of whether the evaluation is conducted internally or externally by a third party. AVPIR can advise on baselines, data collection tools and databases, and plans for analyzing data.
- 3. **Hire an external evaluator, if applicable.** If an external evaluator was proposed, contact the purchasing department to initiate the bidding process. External evaluators must work with AVPIR in collecting data and evaluating the project.
- 4. **Establish a sequence for conducting evaluation activities.** Activities may include complete baseline documentation, conduct pre-tests or surveys, conduct post-tests, and follow-up with participants and partners.
- 5. Finalize data collection methods. Determine what data is needed to show progress toward objectives using performance indicators; plan to collect qualitative and quantitative data from existing or new sources; identify how and where data will be entered and safely stored; and create plans to periodically pull and analyze data for reports and ongoing project improvement.
- 6. **Engage stakeholders.** If the proposed evaluation plan included input from a stakeholder group or steering committee, now is the time to formally establish the group and begin communication. Create opportunities for partners and stakeholders to engage in the evaluation process as well as identify solutions to the findings. Create a feedback loop throughout the process for interim findings and recommendations.
- 7. Initiate data collection. Begin to systematically gather and enter data into a secure database.
- 8. **Analyze the data.** Prepare and implement plans to analyze data for reports and continuous improvement, including sharing results with stakeholders and partners. Compile data and prepare reports. This step involves the external evaluator, if applicable.
- 9. **Monitor the budget.** Review budget expenditures and modifications; and ensure that financial reports are submitted on time.
- 10. Develop plan for disseminating results. Document and disseminate the results and lessons learned via customized communications that meet the specific needs of stakeholder groups. Findings should be considered in decisions or actions that affect the project. Schedule follow-up meetings with report users to make sure the findings are communicated and used appropriately in decision making.

Section 5: Grant Closeout

Grant closeout is the process by which the Project Director, CFO, and Advancement Office determine that all requirements of the grant contract agreement between the funding agency and the College have been completed in accordance with the terms and conditions of the agreement. Finishing a grant project is just as important as starting one. Closing out a grant project involves making sure that all grant contract activities have been completed and funding has been exhausted. Closeout of the grant does not cancel any requirements for property accountability, record retention, or financial accountability. Following closeout, the College remains obligated to return any unexpended funds due to the agency and the sponsor/funding agency may recover amounts based on the results of an audit covering any part of the grant period.

It is highly recommended that you review the Grant Closeout Checklist at least six months prior to the end date of your grant project. Upon closeout, all grant documents and files should be forwarded to the Advancement Office for file labeling and storage.

Note: The Closeout Checklist should be completed and returned to the Grants Office within 60 days of grant end date.

In many cases, the way closeout procedures are handled, such as timely submission of final reports and the quality of those reports, can have a direct impact on the chances for future funding. There are seven grant management items that need particular attention at the closeout of a funded project: precloseout activities, budget, personnel, purchasing activities, files, final reports, and document storage.

Area	Process
Pre-Closeout Meeting	Advancement Office will contact the Project Director to schedule a pre- closeout meeting at least two months prior to the end of the grant.
Budget	Review encumbrances and liquidate those no longer needed. Accounts will be closed soon after the grant's ending date.
Personnel	Complete termination paperwork for all grant-funded staff and if required, submit payroll changes for staff members transferred to other budget accounts or to the new grant budget account assigned to a continuing grant.
Purchasing	Ensure all goods and services have been received prior to the end of the grant, although payment can occur soon after the end of the grant period.
Grant Files	Review all grant documents, personnel records, purchase orders and requisitions, and budget records.
Final Reports	Follow guidelines covered in this section of the handbook.
Document Storage	Plan to have all grant files transferred to the Advancement Office for storage. See Records Management guidelines below.

Disposition of Equipment

Equipment purchased with state or federal funds must be used in the grant project for which it was acquired for as long as the equipment is needed. Grant equipment with a current per unit fair market value (FMV) of \$5,000 of less may be retained, sold, or otherwise disposed of with no further obligation to the Federal awarding agency. The Project Director should complete a Disposal of Surplus Inventory form and submit to the Business Office & include a copy with inventory records. If the FMV is in excess of \$5,000, the Federal awarding agency should be contacted for instruction prior to selling or disposing, according to the terms and conditions of the grant agreement.

Final Reporting

Grant closeout also includes the preparation and submission of final programmatic/technical reports as well as financial reports. Some funding agencies or sponsors have required forms that must be used. All final reports should be submitted to the Advancement Office for review and submittal to the funding agency.

Records Management

The College adheres to Federal rules pertaining to retention requirements for grant agreements. As a general rule, all grant files must be retained for a period of at least three (3) years after final financial report is submitted.

Section 6: Compliance, Audits, and Audit Readiness

<u>Compliance</u>

Grant compliance is the cornerstone of grants management.

Once a grant award is accepted, the College accepts formal, legal responsibility to follow the rules and regulations of the grant including requirements stated in the original request for proposal, the notification of award, and any other supplemental documentation, including the budget. Failure to comply with the terms and conditions could result in a finding of noncompliance and result in the following:

- The College could be labeled as a high-risk grantee, which could result in suspension or termination of current grant projects, and/or impact the College's eligibility for future grant funding (including federal financial aid);
- Cash payments/reimbursements may be withheld until any given deficiency is corrected;
- All or part of the costs for project activity or action that is not in compliance may be disallowed, meaning the College would have to reimburse the funding agency for disallowed costs;
- Future awards for the project may be withheld; and/or
- Other legal remedies may be imposed.

Additionally, the College and the Project Director may be disbarred, suspended, or excluded from managing federal awards and sub-awards for mismanagement or misuse of grant funds.

Audit Readiness

An important thing for project directors to remember is that all grant project records are subject to internal and external audits. When organizations receive external grant funds, particularly state or federal funds, they are responsible for using those funds in accordance with laws and regulations. Recipients must use fiscal control and accounting procedures to ensure proper disbursement of and accounting for these funds. The effective management of public and private funds should be the result of ongoing activities that ensure audit readiness, such as:

- ✓ Administrative controls: Internal policies and procedures an organization follows as part of its normal business operations.
- Accounting controls: Internal policies and procedures that protect an organization's finances and financial records.

- Compliance with Federal, state, and grant program requirements: Adherence to laws and regulations related to reporting of financial status, treatment of grant-related income, eligibility of participants, monitoring of activities, allowability of charges, and direct and indirect cost allocations.
- Records: Should include information adequate to support statements in the proposal and should be retained for the required period of time. The Advancement Office will review your project records during annual file reviews.
- ✓ Internal audits: May be requested by the funding agency to assist in determining the adequacy of controls and systems.

Common Audit Findings

Audit findings can have a negative impact on the College and its ability to obtain grants in the future. The monthly compliance reviews are just one way that the Advancement Office assists in ensuring the potential for audit findings are minimized throughout the grant period. The following is a list of the most common audit findings related to the management and administration of grants:

Common Budget-Re	lated Audit Findings
 Unallowable costs charged to grant Inaccurate administrative costs Misallocation of costs (amounts expended in unapproved cost category or other cost category) Budget adjusted without prior written approval Excessive cost transfers/journal entries 	 Lack of time documentation to support salaries charged to grant budget Inaccurate time and effort reporting or inadequate documentation Lack of consulting agreements and invoices to support services were related to grant and costs were reasonable
	Cost Sharing Audit Findings
 Cash and in-kind amounts not supported by adequate documentation or not verifiable Using other federal funds as match Costs charged based on estimated amounts rather than actual costs Match claimed on Federal Financial Report (FFR) based on estimates, not actual amounts 	 Match expense incurred outside of grant award period Match amounts unreasonable or excessive Match deemed unnecessary to implement grant Match claimed that was not in the approved grant budget
Other Commor	n Audit Findings
 Noncompliance with assurances and special terms and conditions of award Significantly behind schedule in meeting grant deliverables or outcomes Missing or inadequate support documentation for purchases Equipment purchased without program officer approval 	 Changes made to scope of work without program officer approval Delinquent financial and progress reports Delinquent closeout report Inadequate or no sub-recipient monitoring Missing acknowledgement of funding agency on project materials

Section 7: Additional Information

The Advancement Office wants you to be successful in managing and performing the work of your grant project. While this handbook cannot contain information or guidance for every situation, the intent is that it provides overviews of the regulations that govern grants, best practices for successful grant management, guidance for navigating FPC's administration, and tips for efficient and effective management.

On-site Monitoring Visits

It is possible that during the life of your grant, the grant funding agency will conduct an on-site visit. These can be both programmatic and financial. **If you are notified of an upcoming agency monitoring visit, the first thing you should do is notify the Advancement Office**.

Conflict of Interest

FPC requires that individuals involved in procuring goods and services for a grant be free of any conflicts of interest. Conflict may arise when an employee, officer, agent, or any member of the immediate family has a financial interest in the contract. Contractors who assist in the development or draft the grant application must be excluded from bidding to compete for the award. Individuals must disclose any conflicts of interest that exist to the awarding agency. The Advancement Office can assist individuals at FPC with this process.

Disseminating Project Results

One of the final activities to consider as the grant-funded project comes to an end is how the grant project team will disseminate the evaluation results or capture lessons learned in a way that will inform ongoing practices. The proposal may have included a dissemination plan that outlined when, how, and with whom this information would be shared. Be sure to revisit this plan to ensure that the stated information is sent to the appropriate individuals, organizations, or publications. It is also important to consider opportunities to schedule presentations based on the project results or lessons learned at local, regional, and national meetings and conferences. This further promotes FPC and the good work being done here to improve student learning and success. In some cases, it may be necessary, per the grant funding agency as appropriate and where required when creating materials for public dissemination. Frequently, specific language is required by the grant funding agency to be included in any publications or materials generated from the award. Check with the Advancement Office if you have any questions about publicly disseminating grant-related work.

If the proposal did not include a dissemination plan or the grant contract did not prohibit the dissemination of results, the grant project results may be distributed to appropriate professional organizations and publications, shared at conferences, or other means. At a minimum, project results should be submitted to the funding agency, FPC faculty and staff, and partner organizations that were involved with the project.

Appendix A: Grant Award and Budget Management Checklist

Award and Grant Contract Processing

- Inform the Advancement Office of your grant award. Forward a copy of the award notification to the VPAS and keep a copy for your files.
- □ Carefully review the grant proposal and award notification. The Advancement Office will verify the award amount, the budget breakdown, timelines, and reporting requirements.
- □ Work with the Advancement Office to negotiate the budget and/or project details with the program officer.
- Work with the Advancement Office to coordinate the signature process to fully execute the grant contract. The Advancement Office will obtain signatures and forward a copy of the signed contract to you.
- Review the funding agency's policy on publicity. Work with the Advancement Office to coordinate and discuss a press release and requirements for project materials. Funding agency often must be acknowledged and may have included specific language in the grant contract to use.
- □ The Advancement Office will prepare and submit a brief abstract of each awarded grant for inclusion in the President's Report.
- □ Work with the Advancement Office to start a grant file to include the following:
 - Original Request for Proposal (RFP)/Notice of Funding Opportunity (NOFO)
 - Program guidelines
 - Original proposal/application submission documents
 - Final proposal and budget, if amended
 - Original award documents (fully executed) and any amendments or approvals
 - Fully-executed grant contract
 - MOUs with any external partners
 - Indirect Cost Rate Agreement (ICRA)
 - Documentation of in-kind, matching, and cost-sharing commitments in approved budget
 - Project timeline/work plan from original proposal
 - Grant correspondence with funding agency
 - Participant files
 - Sub-grantee monitoring reports and other records
 - Program audit reports
 - Program monitoring and evaluation reports
 - Progress and Financial Reports
 - Closeout documentation
- □ Make a note of important deadlines and set up a process to track deliverables, including:
 - Interim and final progress/narrative reports
 - Interim and final financial reports
 - Deadlines for requesting SOW or budget modifications
 - Deadline for requesting no-cost extensions
- □ Contact Human Resources to initiate the process for hiring grant-funded personnel.
- Review the proposed evaluation plan and implement routine data collection activities. Contact IR for assistance, as needed.

Budget Processing

- Attend the grant kick-off meeting to review the final budget, discuss allowable expenditures, establish dates for financial reporting compliance, and discuss funding draw down and invoicing procedures.
- Review allowable expenditures in the grant budget before making a purchase, contracting with a vendor, or charging the grant for travel expenses. All expenses must be allowable and compliant with the final approved grant budget and must also comply with College policy.
- □ The CFO will provide budget availability reports that are updated regularly. Review these reports on a consistent basis.

Appendix B: Compliance and File Review Checklist

Project Information	
Date:	Dates Covered:
Project Title:	
Award Amount:	
Project Director:	
Project Staff:	

Administrative Files Checklist

- □ Grant Management Handbook
- □ Original proposal/application submission documents
- □ Final proposal and budget, if amended
- Original award documents (fully executed) and any amendments or approvals
- □ Fully-executed grant contract
- □ MOUs with any external partners
- Work Plan
- □ Financial and Narrative Progress Reports

Evaluation Files

- □ Evaluation plan/timeline
- □ External evaluator contract
- □ Goals, objectives, outcomes, performance measures
- Data collection:
 - Data sources
 - Data collection methods
 - Database system for housing data
 - Data analysis plan
 - Distribution of project performance and dissemination of reports and evaluations

Grant Project Status

1. Is recordkeeping satisfactory in accordance with College policies and practices?

_____ Yes _____ No

If no, please explain.

Are activities allowable and on schedule according to the grant contract and work plan?
 Yes ____ No

If no, please explain.

3. Are all procedures related to grant management being followed and documented? _____ Yes _____ No (See Grant Management Handbook)

If no, please explain.

4. Are all grant requirements being met (evaluation, reporting, draw down, etc.)? _____Yes _____No

If no, please explain.

5. Is budget being expended in accordance with the grant contract, program requirements, regulations, and proposed budget?

_____ Yes _____ No

If no, please explain.

6. Is the project fully staffed as outlined in the proposal? _____Yes _____No

If no, please explain.

Are data collection, storage, and analysis systems in place to support reporting?
 Yes _____ No

If no, please explain.

8. Are the performance objectives and outcomes being met?

_____ Yes _____ No

If no, please explain.

9. Have any significant accomplishments or challenges been identified?

_____ Yes _____ No

If yes, please explain.

Summary of the Review

- 1. Is technical assistance needed? ____ Yes ____ No If yes, please explain.
- 2. Are corrective actions recommended? ____ Yes ____ No

If yes, please explain.

Additional comments or concerns discussed during the review:

Appendix C: Grant Pre-Closeout and Closeout Checklists

Please use these documents beginning six months prior to the closeout of the grant period. If you have a multi-year grant, these forms will be useful as the fiscal year is ending, but the grant will not officially closeout until the end of the entire grant period. Contact the Advancement Office with any questions.

Grant Pre-Closeout Checklist

Pre-Closeout (6 months prior to closeout)

- If you do not anticipate that the project will be completed on time, determine if no-cost extension is appropriate and allowed. Contact the Advancement Office for technical assistance if no-cost extension is to be requested.
- Contact the CFO to review all expenditures, encumbrances, and projected final expenses.
 Note: Please keep in mind that all materials and supplies needed for project completion should be purchased at least 30 days prior to the grant period end date, and that all equipment needed for project completion should be purchased at least 60 days prior to the grant period end date. Do not make mass or unusual purchases at the end of a grant period.
- □ Be sure to schedule the preparation and completion of the final narrative and financial reports in accordance with the grant contract.

Budget and Purchasing (Final 30 – 60 days of grant period)

- □ Two months prior to closeout:
 - Clear out all open encumbrances from your grant budget. Discuss any pending items with the CFO.
 - Ensure all sub-recipient invoices have been paid, if applicable. Review the status of any outstanding invoices, final invoices, and confirm all payments have been made with the CFO.
 - Confirm that all interim and final reports and deliverables from sub-recipients or consultants have been received and processed.
 - Finalize all equipment purchases and make plans for final purchases needed for your grant project.
 - Follow-up on any open purchase orders and requisition requests to make sure timely receipt of goods and services and invoices from vendors.
 Note: Purchases of supplies or equipment can be disallowed by auditors if the purchases occur too late in the project to be legitimately needed.
- □ One month prior to closeout:
 - \circ $\;$ Work with CFO to reconcile line items and process any adjustments.
 - Ensure all institutional match (cash, in-kind, etc.) documentation is submitted to the CFO.
 - Inventory all grant equipment and supplies to be sure they are accounted for and on campus.

Personnel

□ Two months prior to closeout, notify Human Resources of the end date for grant-funded positions.

One month prior to closeout, ensure all Time and Effort Certification Forms have been completed and certified and staff have been paid.

Grant Files

- Ensure all grant files are current and include all of the documents listed in the Grant Award and Budget Management Checklist.
- □ Forward all official files to the Advancement Office for proper labeling, maintenance, and storage.

Final Reporting

- □ Have all funding agency-required reports been prepared?
 - Final narrative program report is completed and submitted to the Advancement Office a minimum of five days before the due date.
 - Financial report is completed by the CFO and submitted to the Advancement Office a minimum of five days prior to the due date.
- □ Has the final project evaluation been completed?
 - Final project evaluation was disseminated as required, including to the Advancement Office for the grant master file.

Grant Project Closeout Checklist

The following provides guidance as grant-funded projects are being closed out. Each funding source may have different requirements and specific forms for properly closing out a grant. Be sure to follow this checklist and any funder-specific requirements. Submit the completed checklist to the Advancement Office for inclusion in the grant file within 60 days of grant end date.

- 1. Project budget cost categories at the end of the grant period should show a zero balance.
 - **a.** If there are funds remaining at the end of the grant period, please explain the reason for the unexpended funds.
 - **b.** If there was any overspending in a cost category/budget line, please provide an explanation for the variance.

2. Project objectives should be accomplished and outcomes should be achieved.

- **a.** Verify all milestones and deliverables were met in accordance with the grant.
- **b.** Prepare final reports and submit to the Advancement Office for review.
- c. Once approved, AO will submit final reports to funder and other interested parties.

3. Meet with Advancement Office to finalize closeout.

- **a.** Verify all accounts are closed as of the last day of the grant period.
- **b.** Prepare final financial report for submission to the funder.
- **c.** Complete inventory of any grant-funded equipment.
- d. Develop plan for disposition of equipment and reassignment of supplies remaining.
- e. Ensure all grant-funded employees are notified of grant ending.
- **f.** Verify grant master file is complete and all records are transferred to Advancement Office.
- **g.** Discuss options for seeking additional external funding to continue project.

Signature:	Date:
Project Director	
Signature:	Date:
Advancement Office Staff	

Appendix D: Purchasing Checklist and Bid Summary Form

Purchaser's Name:			Dept:		
Requisition or Purchase Order Numbe	r (if available/applicat	ole):			
To comply with College Purchasing Po completion of this Purchasing Checklis non-Pre-Qualified Suppliers; and, for Suppliers.	t/Bid Summary Form	is required	for all transactions	s \$5,000 or great	er with
This form must be sent to the Busines Failure to do so will cause a non-comp to the to the user for reprocessing.					
FEDERAL GOVERNMENT FUNDS?	YES NO	OTHER S	PONSORED FUNDS	?	🗌 NO
Describe the goods and/or services be	ing procured:				
If applicable, list the three most comp indicating your chosen supplier. Provid		-			r
	de written quotations Price plus any 9 other charges 9	greater tha Shipping Cost	an or equal to \$25,0 <u>Payment/</u> <u>Discount Terms*</u>	000. <u>Negotiated Tota</u> <u>Order Price</u>	<u>al Ch</u>
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