

GRCC | Grants Department

Grant Administration Guide for Federal and Federal Pass-through Awards (Post-Award)

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Introduction

Congratulations! Your grant proposal has been selected for an award and you are ready to begin implementing your project according to your grant contract.

This Grant Administration Guide is intended to provide you with a foundation for meeting basic grant management requirements and standards to help you effectively implement your new grant. As stewards of grant resources, grantees are expected to understand and adhere to both programmatic and administrative laws, regulations, policies, and procedures to effectively implement and manage grant resources.

This guide outlines steps for you to follow as you implement your project. When followed, these steps will increase your success, while minimizing any problems that may arise. This guide also provides information related to maintaining files, preparing reports, ensuring audit readiness, getting your evaluation off to a good start, and a variety of other pertinent topics.

It is important to note that the activities undertaken in the first few weeks of project implementation are crucial to the overall success of your project. These activities will not only set the tone for your project, but will also determine several important factors such as:

- Will you be on target to meet your performance measures?
- Will you expend all of the awarded funds during the project period?
- Will the project documentation hold up under the scrutiny of an audit?

Be sure that you are familiar with the grant proposal, the award letter, the terms of the grant contract, and GRCC's policies and procedures. Being aware of what you can and cannot do and how best to do it will save you potential headaches in the future.

While this Grant Administration Guide will serve as a reference, please don't hesitate to contact the Grants Department if questions arise about grant management procedures.

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Section 1: Setting Up for Success

Award Letter and Contract Processing

Grant sponsors (i.e., Federal agencies, foundations, etc.) will usually inform the person who is listed on the grant proposal as the lead contact person about a new or continuation grant award. Don't assume that the Grants Department has been informed about the award, especially if you are listed as the lead contact person. **Please notify the Grants Department as soon as possible upon receiving an award letter.**



Copies of all award letters and contracts must be received by the Grants Department for inclusion in the institutional project records.

Negotiating the Award

In some instances, a sponsor may request additional information or clarification on a project, or contact you to discuss budget reductions or required modifications. **If you receive any communications from the sponsor, inform the Grants Department immediately.** The Grants Department acts on behalf of the college by leading any negotiating processes with input from executive leadership and/or in preparing modified materials requested by a program officer.

Executing the Grant Agreement

Please note that per the college's [Grants Policy](#), grant agreements may be signed **ONLY** by GRCC's President or Vice President of Finance and Administration, or a delegate via written appointment. These are the only individuals authorized to enter into a binding, monetary agreement on behalf of GRCC. The grant agreement is a legally-binding contract between the college and the sponsor that holds the college accountable for delivering on the outcomes set forth in the contract and for managing all grant monies.

The Grants Department will coordinate the review and approval of contract language with GRCC's General Counsel and Vice President of Finance and Administration. Upon approval of the contract language, the Grants Department will distribute a copy of the fully-executed grant agreement and budget to the project lead for the grant file and to the Grant Accounting Specialist for processing.

Federal Disclosures

Conflict of Interest Reporting

Per 2 CFR 200.112, all project leads, grant-funded employees, and employees whose efforts are used to satisfy a required or voluntary cost share on a Federal grant must comply with GRCC policy and procedures related to conflicts of interest (see Policy 6.7 Conflict of Interest). In addition, GRCC will require subrecipients to maintain a conflict of interest policy for Federal awards or follow

GRCC's conflict of interest policy as if it were directly applicable to the subrecipient. If an employee has any question whether an action or proposed course of conduct would create a conflict of interest, he or she should immediately contact GRCC's Office of General Counsel to obtain advice on the issue. As well, GRCC's policy outlines the conflict of interest reporting procedures.

Federally-Mandated Disclosures

As a recipient of grant funding from Federal agencies, the college complies with Federally-mandated disclosure requirements (2 CFR 200.113). These requirements apply to all college employees and agents involved in administration or work under a Federal award, including but not limited to, General Counsel, employees in the Grants Department, and all employees whose job duties would lead them to become aware of any of the matters which are the subject of required notification under this provision.

GRCC's Vice President of Finance and Administration, or a designee, shall provide written notification to the Director of Grant Development of any of the following, as outlined in 2 CFR 200.113:

- i. Notice of suspension or debarment pertaining to GRCC or any employee, contractor, subcontractor, or agent working on or otherwise associated with the Federal award.
- ii. Violations of Federal criminal law involving fraud, bribery or gratuity violations potentially affecting the Federal award.
- iii. A criminal proceeding that resulted in a conviction and was in connection with the award or performance of the Federal award.
- iv. A civil proceeding that resulted in a finding of fault and liability and payment of a monetary fine, penalty, reimbursement, restitution or damages of \$5,000 or more and was in connection with the award or performance of the Federal award.
- v. An administrative proceeding that resulted in a finding of fault and liability and payment of either a monetary fine or penalty of \$5,000 or more or reimbursement, restitution or damages of more than \$100,000 and was in connection with the award or performance of the Federal award. (An "administrative proceeding" includes a proceeding at the Federal and state level but only in connection with performance of a Federal contract or grant. It does not include audits, site visits, corrective plans or inspection of deliverables).
- vi. Suspected or reported violations of the Davis-Bacon Act by contractors. (This provision applies only to construction contracts).
- vii. Suspected or reported violations of the Copeland "Anti-Kickback" Act by contractors. (This provision applies only to construction contracts).
- viii. Violation of Clean Air Act and Federal Water Pollution Control Act by contractors.

Procedures

1. Any GRCC employee who has knowledge of any incident or event set forth in the list above (per 2 CFR 200.113), will take all reasonable steps to assure that GRCC's Vice President of Finance and Administration is promptly notified of the incident or event.
2. The Grants Department and the Office of General Counsel will be notified of the incident or event by the Vice President of Finance and Administration as soon as possible after the incident or event was identified.
3. The Grants Department will file required notification to the Federal System for Award Management as soon as possible upon receipt of reportable information.

4. The Grants Department will provide written notification to the applicable Federal agency or pass-through entity as soon as possible upon receipt of the reportable information.
5. The Grants Department will report any actions taken under these procedures to the Vice President of College Advancement.

Financial Conflict of Interest Reporting

As a recipient of grant funding from Federal agencies, the college will comply with Federal regulations related to financial conflicts of interest. The Grants Department will use the Financial Conflict of Interest Disclosure Form for monitoring compliance with this requirement, as applicable. Circumstances which arise that potentially or actually involve conflicts of interest must be promptly and fully disclosed to the Grants Department by the employee via completion of this form.

The Financial Interest Disclosure Form must be completed within 30 days of a person's appointment or employment as a principal investigator, co-principal investigator, or project lead and annually thereafter. An amended form must be completed within 30 days of discovering or acquiring a significant financial interest that was not noted on the annual form.

Definitions:

- i. Project lead means the principal investigator (PI), co-principal investigator (co-PI), or project manager of a Federally-funded research project or any Public Health Service (PHS) project.
- ii. Family means any member of the project lead's immediate family. Specifically, any dependent children and spouse, his or her domestic partner whom the employee has registered with GRCC's Human Resources for purposes of employee benefits, or an organization that employs, or is about to employ, any such person.
- iii. Financial interest means anything of monetary value received or held by a project lead or their family, whether or not the value is readily ascertainable, including, but not limited to:
 - a. salary or other payments for services (e.g., consulting fees, honoraria, or paid authorships for other than scholarly works);
 - b. any equity interests (e.g., stocks, stock options, or other ownership interests); or
 - c. intellectual property rights and interests (e.g., patents, trademarks, service marks, and copyrights), upon receipt of royalties or other income related to such intellectual property rights and interests.
- iv. Financial interest also includes any reimbursed or sponsored travel undertaken by a project lead and related to his/her institutional responsibilities. This includes travel that is paid on behalf of the project lead as well as travel that is reimbursed, even if the exact monetary value is not readily available. It excludes travel reimbursed or sponsored by U.S. Federal, state or local governmental agencies, U.S. institutions of higher education, research institutes affiliated with institutions of higher education, academic teaching hospitals, and medical centers.
- v. Institutional responsibilities means the project lead's professional responsibilities associated with his or her appointment or position at GRCC, such as teaching, administration, and institutional, internal and external professional committee service.
- vi. Project lead means any individual(s) responsible for the design, conduct, or reporting of NSF or PHS-sponsored research, projects or programs or proposals for such funding. This definition is not limited to those titled or budgeted as principal investigator or co-investigator on a particular proposal, and may include collaborators or consultants as appropriate.
- vii. NSF means the National Science Foundation.

- viii. PHS means the Public Health Service of the U.S. Department of Health and Human Services, and any components of the PHS to which the authority of the PHS may be delegated. The components of the PHS include, but are not limited to, the Administration for Children and Families, Administration on Aging, Agency for Healthcare Research and Quality, Agency for Toxic Substances and Disease Registry, Centers for Disease Control and Prevention, Federal Occupational Health, Food and Drug Administration, Health Resources and Services Administration, Indian Health Service, National Institutes of Health, and Substance Abuse and Mental Health Services Administration.
- ix. Research means a systematic investigation, study, or experiment designed to contribute to generalizable knowledge relating broadly to public health, including behavioral and social-sciences research. The term encompasses basic and applied research (e.g., a published article, book or book chapter) and product development (e.g., a diagnostic test or drug).
- x. Significant financial interest means a financial interest that reasonably appears to be related to the project lead's institutional responsibilities, and:
 - a. if with a publicly traded entity, the aggregate value of any salary or other payments for services received during the 12-month period preceding the disclosure, and the value of any equity interest during the 12-month period preceding or as of the date of disclosure, exceeds \$5,000; or
 - b. if with a non-publicly traded entity, the aggregate value of any salary or other payments for services received during the 12-month period preceding the disclosure exceeds \$5,000; or
 - c. if with a non-publicly-traded company, is an equity interest of any value during the 12-month period preceding or as of the date of disclosure; or
 - d. is income exceeding \$5,000 related to intellectual property rights and interests not reimbursed through GRCC, or
 - e. is reimbursed or sponsored travel related to his or her institutional responsibilities.

Financial Conflict of Interest means a significant financial interest that GRCC reasonably determines could directly and significantly affect the design, conduct or reporting of NSF or PHS-sponsored research, projects or programs.

Financial Interest does NOT include:

- i. salary, royalties, or other remuneration from GRCC;
- ii. income from the authorship of academic or scholarly works;
- iii. income from seminars, lectures, teaching engagements or services sponsored by, or from, advisory committees or review panels for U.S. Federal, state or local governmental agencies, U.S. institutions of higher education, research institutes affiliated with institutions of higher education, academic teaching hospitals, or medical centers;
- iv. equity interests or income from investment vehicles, such as mutual funds and retirement accounts, so long as the Investigator does not directly control the investment decisions made in these vehicles; or
- v. any ownership interests in the organization if the organization is an applicant under the Small Business Innovation Research Program or Small Business Technology Transfer Program.

Training: Voluntary financial conflict of interest training is available to all project leads and is strongly encouraged by the college. Training can be found at this [link](#).

Procedures

1. *Initial Disclosures:* Within 30 days of his or her initial appointment or employment as project lead, all investigators must disclose their significant financial interests to the Grants Department by completing and submitting the Financial Conflict of Interest Disclosure Form.
2. *Annual Disclosures:* All project leads must disclose if they have any significant financial interests on an annual basis. The completed Financial Conflict of Interest Disclosure Form must be submitted to the Grants Department within 30 days of the request for the information.
3. *Amended Disclosures:* All project leads must submit to the Grants Department an amended disclosure of any significant financial interest he or she acquires or discovers during the course of the year, within thirty (30) days of discovering or acquiring the significant financial interest.
4. Within 30 days of receiving the Financial Conflict of Interest Disclosure Form from the project lead, the Grants Department will review it. If the form reveals a significant financial interest, the Grants Department will make a determination of whether it constitutes a financial conflict of interest. Input will be requested from the VP of Finance and Administration as needed.
5. If a financial conflict of interest exists, the Grants Department will take action to manage the conflict, including the reduction or elimination of the conflict as appropriate. A financial conflict of interest will exist when the Grants Department or designee reasonably determines that a significant financial interest could directly and significantly affect the design, conduct, or reporting of NSF or PHS-sponsored research, projects or programs.
 - a. If the Grants Department determines that there is a financial conflict of interest that can be managed, the department will develop and implement a written management plan. The affected project lead must formally agree to the proposed management strategies and sign the written management plan before any related NSF or PHS-sponsored Research, projects or programs go forward.
 - b. The Grants Department will periodically review the ongoing activity, monitor the conduct of the activity and otherwise oversee compliance with the management plan.
6. The Grants Department will report identified financial conflicts of interest to the Purchasing and Accounting and Budget Services Departments.
7. The Grants Department will report identified financial conflicts of interest, the resulting management plan and non-compliance, if applicable, to NSF or PHS or to the prime awardee, in accordance with agency regulations. Such reports shall be sent to the awarding agency or to the prime awardee prior to the expenditure of any funds and within 60 days of any subsequently identified financial conflicts of interest. In addition, the Grants Department will submit annual updates to NSF or PHS on previously reported financial conflicts of interest.
8. In the case of non-compliance, the Grants Department will recommend to the President that the college suspend all relevant activities until the financial conflict of interest is resolved or other action deemed appropriate by the executive leadership team is implemented.
9. The initial and annual disclosure forms, conflict management plans, and related documents will be retained electronically by the Grants Department for a period of three years from the date the final expenditure report is submitted to NSF or PHS or to the prime awardee. Upon request, the Grants Department will allow NSF and PHS access to all records related to compliance with this requirement. If any litigation, claim, financial management review, or audit is started before the expiration of the three-year period, the records shall be retained until all litigation, claims or audit findings involving the records have been resolved and final action taken.

This section of the Grants Administration Guide implements the requirements of 42 CFR 50 Subpart F and 45 CFR 94; this section also implements the requirements of the section entitled *Grantee Standards, Conflict of Interest Policies in the NSF Proposal and Award Policies and Procedures Guide, Part II - Award & Administration Guide*.

Announcing the Award

Board of Trustees (BOT) Consent Agenda. The Grants Department will prepare and submit a brief abstract of each grant project for inclusion in the BOT consent agenda.

Press Release and Other Media Coverage. Grant awards and the projects that they support are often announced in a press release. Your grant contract will outline how the sponsor wishes to be recognized and any restrictions that apply in the event that a press release is issued by the college. To initiate a press release, the project lead should begin the process by emailing the Director of Communications. The project lead is responsible for working with the Communications Department staff to develop the content of the press release. As such, it is important to note that the message should focus on the work of the project and its beneficiaries, as opposed to the amount of the award.

Post-Award Conference

The Grants Department will schedule a post-award conference within 30 days of the notice of award, or the appointment of a new project lead. This meeting is an opportunity for you to ask questions and receive clarification on any aspect of project implementation. **It is therefore important that you review your grant agreement prior to the meeting, as it is critical for you to become extremely familiar with the terms and conditions of the award, timelines and performance objectives, and any other requirements referenced in the award documents.** You do not want to inadvertently fail to comply with the grant requirements because you did not take the time to read them. The post-award meeting will cover the following agenda topics and others as applicable:

- Terms and conditions that are outlined in the grant agreement
- Specific “next steps” and timelines for project implementation and planned activities
- Best practices for establishing a recordkeeping system
- Budget monitoring and reconciliation processes
- Process for documenting cost share
- Establishing a database for tracking project data
- Issues, policies, and procedures pertaining to equipment and supply purchases and consultant subcontracting
- Expectations regarding reporting requirements and report due dates

Additional onboarding meetings will be scheduled at 45 days and 90 days to cover specific topics that arise during the initial implementation phase.

Establishing a Recordkeeping System

The grant file should include all administrative documents associated with applying for and fulfilling the grant contract as well as any documents necessary for recordkeeping and audit preparations. You should also keep copies of all communications with the sponsor and subrecipients (if applicable). For each new grant-funded project, the project lead must create a hard copy and corresponding electronic file that includes, at a minimum, the following documentation:

- Request for proposals (RFP)/notice of funding opportunity (NOFO)/proposal solicitation
- Program regulations/guidelines/underpinning legislation
- Original proposal as submitted and related attachments
- Original award notification
- Fully-executed grant contract and amendments
- Final, revised proposal and budget, if amended, as well as related approvals
- Memoranda of understanding with partners, including commitment letters
- Subaward agreements, if applicable
- Cost share commitments included in the budget and related documentation
- Project timeline/implementation timeline/plan of work from original proposal
- Correspondence with the sponsor
- Invoices and copies of receipts for purchases made with grant monies
- Grant personnel files, including Time and Effort Certification Forms
- Participant records and project data
- Audit reports
- Program monitoring and evaluation reports
- Budget reports
- Subrecipient-contractor determination forms, monitoring reports and other records, as applicable
- Closeout documents



Remember, grant files may be subject to a future audit and therefore must be kept in proper order.

Approved Budget

Upon receipt of the fully-executed contract and approved budget, the Grant Accounting Specialist will set up the project's internal, financial account based on the line items in the approved budget. This account will be used for processing fund transfers and making project-related purchases. Most sponsors use electronic wire transfers to credit grant accounts. This system will be set up and administered by the Grant Accounting Specialist as outlined in the award documents. Please note that **only** the Grant Accounting Specialist has the authority to deposit and draw down grant funds awarded to GRCC.

During the post-award meeting, the Grant Accounting Specialist will review GRCC's fiscal management processes and policies with the project lead. If you are the project lead and you need to request access to PeopleSoft Financials or training, visit the Accounting and Budget Services [webpage](#) for next steps. It is recommended that all project leads schedule routine meetings with the Grant Accounting Specialist to monitor expenditures throughout your project's fiscal year.

It is very important that you, the project lead, are very familiar with the line items and amounts listed in the project budget, as approved by the sponsor. You and your department's budget control officer (BCO) are responsible for initiating or approving all direct charges to the project's financial account. If budget modifications are necessary for any reason, you must work with the Grants Department and Grant Accounting Specialist to prepare your proposed revisions before contacting the sponsor to request approval of the modifications.

Hiring Grant-Funded Personnel

Oftentimes, grant projects will include new personnel. If new employees are to be hired for the project, the project lead must follow the college's standard hiring process and procedures. As part of the grant development process, a tentative job title and position description were created. These will serve as a starting point if you have not already completed the Position Authorization Form (PAF) and job classification processes. Please note that these processes can take three months or longer to complete, and the hiring process cannot move forward until the PAF and job classification are approved by Human Resources and the executive budget control officer (EBCO) for the department. If you have not already done so, begin these processes immediately after receiving the notification of award.

For specific information regarding the college's policies and procedures involved in obtaining approval and posting a position, and guidance on the selection and hiring processes, please consult with the Human Resources staff member assigned to the respective employment group that the new employee will be part of (i.e., Meet & Confer, APSS, etc.). You will find that information on the Human Resources [webpage](#).

Funding Agency Approval of Key Personnel. For Federal grants, if the original grant proposal does not specifically identify all "key personnel," the college is required to submit to a request for approval letter to the sponsor before filling the vacant position. A resume of the individual must be included with the request letter. The project lead is responsible for sending this request via email and copying the Grants Department.

Personnel Changes. During the grant period, it may be necessary to add or replace grant-funded personnel. Most sponsors, as part of the terms of the grant, have established procedures for prior approval of personnel changes that must be followed. The Grants Department will assist the project lead in obtaining internal and external approval for all personnel changes. All requests must be made in writing by the project lead and the Grants Department must be copied. Approval must be given by the project lead's supervisor and secured in advance of implementing the changes.

Preparing to Evaluate the Project

Monitoring and evaluation are key aspects of any grant-funded project, as they inform progress toward the achievement of objectives, the effectiveness of pedagogies and methods, and whether or not processes or strategies require adjustment during the grant period. Expectations for the rigor and quality of evaluation plans have increased in recent years. That is why it is of utmost importance to keep in mind that evaluation must be an ongoing process throughout the grant period. As the project lead, you must be familiar with reporting schedules and be prepared to implement routine data collection as a primary project activity. While not intended to be all encompassing, the following list provides steps for getting started on a comprehensive project evaluation:

- **Know what the project is responsible for delivering.** Review goals, objectives, outcomes, milestones, and action plans, as well overall strategies and logic models. Scrutinize performance measures and indicators and carefully plan the tools to be used for collecting and storing data, the timing for data collection, and how the data will be analyzed.
- **Seek Institutional Review Board (IRB) approval.** Review the next section of this manual and work with the Grants Department to determine if IRB approval is necessary for your project.
- **Contact the Institutional Research Department (IR)** to discuss your evaluation plans. Project leads must work with IR regardless of whether or not the evaluation is conducted internally or by an external evaluator. IR can advise on baseline data, data collection tools and databases, and plans for analyzing data.
- **Hire an external evaluator, if applicable.** If you proposed to hire an external evaluator, contact the Purchasing Department to initiate the bidding process. External evaluators must consult with the IR Department in collecting GRCC data and evaluating the project.
- **Establish a sequence for conducting evaluation activities** such as establishing baseline data, conducting pre-tests or surveys, conducting post-tests or document reviews, and interviewing or following-up with participants and partners.
- **Finalize data collection methods.** Determine what data is needed to show progress on performance indicators, plan to gather 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 enter, and then pull and analyze data for ongoing improvements and reports.
- **Engage stakeholders.** Did the proposed evaluation plan include input from a stakeholder group or steering committee? If so, now is the time to formally establish the group and begin communicating regularly. Create opportunities for partners and stakeholders to engage in the evaluation process as well as determine steps taken in reaction to the findings. Create a feedback loop with stakeholders throughout the evaluation regarding interim findings and preliminary interpretations.
- **Develop a plan to ensure dissemination of results, as appropriate.** Document and disseminate the results and lessons learned via tailored communications that meet the needs of particular stakeholder groups (e.g., employers, GRCC leadership, community, etc.). The findings should be considered in decisions or actions that affect the program. Schedule follow-up meetings with intended users to make sure the evaluation conclusions are communicated and used appropriately in decision-making.

Federally-Mandated Third-Party Evaluations

Regarding Federally-funded projects, GRCC may be required to participate in a third-party evaluation. The evaluation may include an experimental impact evaluation wherein eligible participants will be randomly assigned to the program or to a control group that does not receive the program. The evaluation may involve making records on participants, partners, or funding available; providing access to program and partner personnel and participants; facilitating random assignment by conducting a lottery of participants to receive program services (including the possible increased recruitment of potential participants); and following evaluation procedures as specified by the evaluator under the direction of the Federal agency, including after the period of operation.

Seeking Institutional Review Board Approval

The GRCC Institutional Review Board (IRB) is responsible for monitoring research activities conducted at the college to protect the rights and safety of human subjects and to maintain the integrity of the institution. In fulfilling its task, the IRB must carefully examine research proposals to arrive at an independent determination that the research will meet the following ethical criteria:

- Risks to subjects are minimized.
- Risks to subjects are reasonable in relation to anticipated benefits.
- Selection of subjects is equitable.
- Informed consent is sought from each prospective subject or the subject's legally authorized representative.
- Informed consent is appropriately documented.
- When appropriate, the research plan makes adequate provision for monitoring the data collected, to ensure the safety of subjects.
- When appropriate, there are adequate provisions to protect the privacy of subjects, and to maintain the confidentiality of data.
- Additional safeguards are included to ensure that members of vulnerable populations (e.g., children, prisoners, pregnant women, mentally disabled persons, or economically or educationally disadvantaged persons) are not the subject of coercion or undue influence.

Unless the research has been deemed exempt prior to submission of the proposal, the submission and approval of a GRCC IRB application may be necessary prior to commencing any type of human subject research (i.e., research involving students, faculty, or staff) as part of your grant evaluation activities. The application and instructions can be found on the Institutional Research Department's [webpage](#). If you have any doubts about whether or not your research or evaluation plan requires IRB approval, it is best to contact Institutional Research to discuss your plans.

Section 2: Subrecipients

Initial Risk Assessment

As a prime recipient of grant funding from Federal agencies, GRCC may negotiate subawards with other entities. The Grants Department is responsible for coordinating the pre-award risk assessment of potential subrecipient entities. The Subrecipient Commitment Form is used for this purpose and this process is typically completed prior to submission of a proposal.

Procedures

1. Prior to submission of the proposal, the Grants Department or project lead will request that external partner(s) complete the Subrecipient Commitment Form and provide required documentation (e.g., scope of work, budget and justification, letter of commitment, indirect cost rate agreement, etc.).
2. The Grants Department maintains the pre-award risk assessment documentation and submits the results to the Accounting and Budget Services Department if/when the grant is awarded and a potential subaward will be executed.

Subrecipient or Contractor Determination

For Federal grant projects, GRCC must determine the relationship status with an external entity in compliance with 2 CFR 200.330. In determining whether an agreement between a pass-through entity (GRCC) and another non-Federal entity casts the latter as a subrecipient or a contractor/vendor, the substance of the relationship is more important than the form of the agreement. All of the characteristics listed below in the definitions may not be present in all cases, and GRCC must use judgment in classifying each agreement as a subaward or a procurement contract.

Contractor (including consultants) (2 CFR 200.23) means an entity that receives a contract as defined in §200.22 *Contract*. Contract means a legal instrument by which a non-Federal entity (GRCC) purchases property or services needed to carry out the project or program under a Federal award. Characteristics indicative of a contractor are:

- Provides the goods and services within a normal business operation.
- Provides similar goods and services within normal business operation.
- Operates in a competitive environment.
- Provides goods or services that are ancillary to the operation of the Federal program.
- Is not subject to compliance requirements of the Federal program.
- Will not have responsibility for programmatic decision making.

Subrecipient (2 CFR 200.93) means a non-Federal entity that receives a subaward from a pass-through entity to carry out part of a Federal program, but does not include an individual that is a beneficiary of such program. A subrecipient may also be a recipient of other Federal awards directly from a Federal sponsor. Characteristics indicative of a subrecipient are when the organization:

- Determines who is eligible to receive what Federal financial assistance.

- Has its performance measured against whether the objectives of the Federal program are met.
- Has responsibility for programmatic decision-making.
- Has responsibility for adherence to applicable Federal program compliance requirements.
- Will use the Federal funds to carry out a program of the organization, as compared to providing goods or services for a program of GRCC.

Procedures

1. The project lead completes the Subrecipient or Contractor Classification Checklist for each non-Federal entity that will receive grant funds.
2. The project lead emails the completed checklist to the Grants Department for review and approval of the determination.
3. The Grants Department returns the signed form to the project lead, which is to be kept as part of the official project records.

Subaward Agreements

Upon determination of subrecipient status, the Director of Grant Development, or a delegate, shall assist the project lead in drafting the subaward agreement as outlined in 2 CFR 200.332(a) for review and approval by GRCC's General Council and Vice President for Finance and Administration. Upon approval, the Grants Department will disseminate the subaward agreement to the potential subrecipient for review and execution. If the potential subrecipient requests changes to the agreement, those changes must be negotiated with GRCC's General Council. The subaward shall, at a minimum, contain the following:

1) Federal award identification:

- The subrecipient's name and UEI number (subrecipient name and UEI must match);
- The Federal award name, Federal award identification number (FAIN), and amount;
- Federal award date (see the definition of *Federal award date* in [§ 200.1 of this part](#)) of award to the recipient by the Federal agency;
- Subaward Period of Performance Start and End Dates;
- Subaward Budget Period Start and End Dates;
- Amount of Federal funds obligated by this action by the pass-through entity (GRCC) to the subrecipient;
- Total amount of Federal funds obligated to the subrecipient by the pass-through entity (GRCC) including the current financial obligation;
- Total amount of the Federal award committed to the subrecipient by the pass-through entity (GRCC);
- Federal award project description, as required to be responsive to the Federal Funding Accountability and Transparency Act (FFATA);
- Name of Federal awarding agency, pass-through entity (GRCC), and contact information for awarding official of the pass-through entity (GRCC);
- Assistance Listings Number and Title; the pass-through entity (GRCC) must identify the dollar amount made available under each Federal award and the Assistance Listings Number at time of disbursement;

- Identification of whether the award is R&D;
- Indirect cost rate for the Federal award (including if the de minimis rate is charged) per [§ 200.414](#);
 - (i) An approved federally recognized indirect cost rate negotiated between the subrecipient and the Federal Government. If no approved rate exists, the pass-through entity must determine the appropriate rate in collaboration with the subrecipient, which is either:
 - A. The negotiated indirect cost rate between the pass-through entity and the subrecipient; which can be based on a prior negotiated rate between a different PTE and the same subrecipient. If basing the rate on a previously negotiated rate, the pass-through entity is not required to collect information justifying this rate, but may elect to do so;
 - B. The de minimis indirect cost rate.
 - (ii) The pass-through entity must not require use of a de minimis indirect cost rate if the subrecipient has a Federally approved rate. Subrecipients can elect to use the cost allocation method to account for indirect costs in accordance with [§ 200.405\(d\)](#).
- All requirements imposed by the pass-through entity (GRCC) on the subrecipient so that the Federal award is used in accordance with Federal statutes, regulations and the terms and conditions of the Federal award;
- Any additional requirements that the pass-through entity (GRCC) imposes on the subrecipient in order for the pass-through entity to meet its own responsibility to the Federal awarding agency including identification of any required financial and performance reports;
 - Requirement stating GRCC shall receive a copy of the subrecipient's A-133 audit report before entering into, or renewing, the subaward;
 - Reference to all Federal laws, program-specific laws, administrative requirements, cost principles, audit requirements and specific grant agreement terms and conditions/requirements that the subrecipient must follow during the term of the agreement;
 - Details on the use of prior approvals and on reporting requirements, including report deadlines, required content of both performance and financial reports and documented correlation between performance/project activities and financial results;
- A requirement that the subrecipient permit the pass-through entity (GRCC) and auditors to have access to the subrecipient's records and financial statements as necessary for the pass-through entity (GRCC) to meet the requirements of this part; and
- Appropriate terms and conditions concerning closeout of the subaward. This must include closeout requirements, including deadline for completion of closeout activities, specific deadlines for financial and performance reports, the individual at GRCC to whom documentation should be sent from the subrecipient, and the method by which documentation is to be submitted to GRCC by the subrecipient.

Procedures

1. The project lead completes the Subrecipient or Contractor Classification Checklist and emails this to the Grants Department.

2. The Grants Department will work with the project lead to draft the subaward agreement to ensure all necessary information for compliance with 2 CFR 200.332 is included.
3. The Grants Department provides the subaward agreement to GRCC's General Council for review.
4. Upon approval, the Grants Department disseminates the agreement to the subrecipient for review and signature.
5. The subrecipient must return the signed agreement to the Grants Department, which will then coordinate counter signatures and return the fully-executed agreement to the project lead and subrecipient.

Once a subaward is established, the project lead is responsible for:

- Maintaining active lines of communication with subrecipients throughout the grant period.
- Reviewing technical and performance reports.
- Reviewing and approving invoices to ensure charges reflect the activities/performance accomplished during the time period covered by the invoice.
- Approving invoices in a timely manner to ensure payment can be processed within the 30-day Federal requirement.
- Approving final invoices so that closeout procedures can be accomplished within Federal deadlines.
- Reviewing and approving cost share/leveraged funds reports and time and effort forms to validate the documentation provided.

Monitoring Subrecipients

The Grants Department and Grant Accounting Specialist are responsible for assisting the project lead in monitoring subrecipients through annual risk assessment procedures. GRCC shall monitor the activities of the subrecipient as necessary to ensure that the subaward is used for authorized purposes, in compliance with Federal statutes, regulations, and the terms and conditions of the subaward, and that subaward performance goals are achieved. The Annual Risk Assessment Form and Uniform Guidance Monitoring Assessment will be used for annual monitoring purposes. Annual risk assessment procedures will be used to categorize subrecipients into one of three risk levels: Standard Risk, Medium Risk, and High Risk. The categorization determines the nature and extent of monitoring procedures that shall occur. The Grant Accounting Specialist and project lead will perform the following based on each risk level:

i. Standard Risk (Low)

Verify that annual audit reports pertaining to audits of Federally-funded program expenditures are completed annually by sending a certification letter to subrecipients requiring either a) a certification that an audit was not required for the year including the amount of Federal expenditures for the year; or b) a certification specifying the total Federal expenditures for the year and requiring submission of the report to GRCC within nine months of the subrecipient's fiscal year ending or within 30 days of the audit report's issuance to the subrecipient.

- Review and evaluate audit report findings, if applicable, for impacts on Federal award financial and performance data.
- Modify Federal award financial and performance data, if necessary.

- Issue management decisions to subrecipients following review of subrecipient audit reports, if findings were reported.
- Monitor, through correspondence with the subrecipients, the facilities and administrative rate agreements to assess the accuracy of the rates used for reimbursement during the award period.
- Review monthly invoices to ensure: Timeliness; Completeness of supporting documentation; Accuracy; project lead approval stating “Okay to pay;” Monitor cumulative budget vs. expense; and Confirm compliance with Federal agency reporting requirements.

ii. Medium Risk (in addition to procedures noted above for Standard Risk subrecipients)

- Provide training and technical assistance.
- After first year, follow-up/review to determine financial compliance and re-assess risk level.
- Consider whether a desk review is necessary.

iii. High Risk (in addition to procedures noted above for Standard Risk and Medium Risk subrecipients)

- Determine whether to audit or perform a site visit or desk review.
- Request regular contact and communication with the GRCC project lead.
- Document conversations and retain pertinent emails.
- Withhold payments, if necessary.

Procedures for Reporting, Corrective Action, and Follow-Up

As appropriate, the project lead will develop a written report identifying observations noted from monitoring procedures and issue the report to subrecipients for review and corrective action. As a result of the monitoring procedures and reporting, GRCC will follow-up with subrecipients to determine whether adequate corrective action was taken. In instances in which subrecipients have not taken adequate corrective action, the project lead will assess the need for potential penalties as permitted by the subaward agreement with the applicable subrecipient. Regarding audit reports received from subrecipients, GRCC will review and issue a management decision to each subrecipient regarding corrective action needs, disallowances, and other matters.

As appropriate, the project lead will develop a report identifying observations noted from monitoring procedures and issue the report to subrecipients for review and corrective action. As a result of the monitoring procedures and reporting, the project lead will follow-up with subrecipients to determine whether adequate corrective action was taken. In instances in which subrecipients have not taken adequate corrective action, the project lead will assess the need for potential penalties as permitted by the subaward agreement with the applicable subrecipient. Regarding audit reports received from subrecipients, the Grant Accounting Specialist will review and issue a management decision to each subrecipient regarding corrective action needs, disallowances, and other matters.

Subrecipient Reimbursements

Subrecipients are responsible for submitting periodic invoices to the GRCC project lead for the costs incurred on their project activities. GRCC’s standard subaward template requires, at a minimum,

quarterly invoices from each subrecipient. The subrecipient is responsible for retaining supporting documentation for the invoiced costs and must provide copies of that documentation with the request for reimbursement. The project lead is responsible for setting up a mechanism to monitor subaward project activities and progress, and to monitor invoice reviews and payments.

Upon receipt of a request for reimbursement/invoice from a subrecipient organization, the project lead is responsible for reviewing, approving, and authorizing payment of the invoices. BCOs may assist with the review process, but the project lead is responsible for approving each subrecipient invoice prior to processing a payment. Prior to approving a subaward invoice, the project lead should review the invoice to determine the following:

- All invoiced costs are **allowable** costs under the grant award;
- All invoiced costs are **reasonable costs** consistent with the subrecipient's accomplishments during the invoice period; and
- All invoiced costs are **allocable** to the subrecipient's activities under the subaward Scope of Work.

If an invoice includes costs that require clarification before an allowability, reasonableness, or allocability determination can be completed, then the project lead must contact the subrecipient to request the clarifications. The project lead is responsible for retaining documentation of this communication for the subaward grant record. If an initial request for clarifications does not answer all questions about the invoice, the project lead can contact the Grant Accounting Specialist to discuss the remaining questions and determine a course of action. The project lead should not approve an invoice for payment until all questions have been resolved, and they have sufficient information to make an allowability, reasonableness, and allocability determination for the invoiced costs.

Once an invoice is approved, the recommended best practice is for the project lead to sign the invoice or indicate by email that the invoice is approved and may be paid. The project lead is responsible for retaining a copy of each invoice and its corresponding approval, as well invoice documentation. Please keep in mind that, in accordance with the Federal Uniform Guidance found at 2 CFR 200.305(b)(3), GRCC is responsible for reviewing, approving, and paying each properly submitted subrecipient invoice within 30 calendar days of receipt.

The project lead is also responsible for reviewing **cost share** commitments of subrecipient organizations. When a subrecipient has agreed to cost share on a subaward project, each invoice should identify the level of cost share committed during the invoice period. The project lead is responsible for tracking the subrecipient's progress in completing their cost share commitments. If the project lead experience difficulties with a subrecipient's inability to report on the cost share incurred during an invoice period, the department can contact the Grants Department to determine a course of action.

Procedures

1. Requests for reimbursement are submitted directly to the project lead by the subrecipient.

2. The project lead reviews the request for reimbursement using the Subrecipient Invoice Checklist and makes an allowability, reasonableness, and allocability determination as described above.
3. Unless additional clarification is necessary, the project lead approves the invoice by signing the invoice or indicating by email that the invoice is approved and may be paid. This approval indicates that the programmatic progress is satisfactory and that the financial consideration is in line with the budget and progress made to date.
4. The project lead emails the invoice and documentation to accountspayable@grcc.edu for payment.
5. The project lead retains a copy of each invoice and its corresponding approval, as well invoice documentation.

Final invoices: At the conclusion of a subaward, the subrecipient is responsible for submitting a final invoice that the subrecipient marks as “final.” GRCC’s standard subaward template requires the subrecipient to submit the final invoice within 60 days of the end date of the subaward.

The project lead’s approval of a final invoice is a critical step in the proper closeout of a subaward agreement. When reviewing a final invoice, the project lead should only approve and authorize payment if they are satisfied that: 1) the subrecipient has completed its performance under the subaward budget period; 2) the subrecipient has submitted all required reports and/or other deliverables to the project lead; and 3) the costs incurred are appropriate for that performance. If the project lead is in any way dissatisfied with any of these three categories, then the final invoice should not be paid until these matters are resolved. Once resolved, the subrecipient is required to retain copies of all supporting documentation for a period of three years or as required by the sponsor after the end of the subaward period of performance.

Section 3: Implementation

Applying Best Practices

The implementation stage is the longest stage of the grant lifecycle. By now you've reviewed the approved activities, timelines, and budget, and have completed each of the steps in the previous section of this guide. This section provides best practices for managing the various aspects involved in implementing the project.

Pro Tip



Use this checklist monthly to keep the project on track for success.

- Verify that all grant project files are up-to-date.
- Review account availability reports (on the S: drive). These reports are updated regularly.
- Review the allowable expenditures in the grant budget before making a purchase, contracting with a vendor, or charging the grant for travel expenses.
- Review fiscal and progress report deadlines. Complete reports as needed.

Note: Narrative reports are due to the Grants Department a minimum of **five (5)** working days prior to the deadline.

Managing the Budget

Please note that it is imperative that you spend all grant funds in a timely and prudent manner as outlined in the approved budget. Grant budget reports must be consistent with the project narrative and data reports. If issues with project implementation arise that will impact the project budget, please contact the Grant Department and Grant Accounting Specialist as soon as possible, and well before reports are due.

As the project progresses, be sure to contact the Grant Accounting Specialist periodically to:

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

Procedures

1. Upon notification of an award, the Grants Department will review the grant agreement and schedule a post-award conference wherein the budget is reviewed on a line-by-line basis with the project lead, Associate Controller, and other key grant personnel.
2. During the post-award conference, the Grants Administration Guide for Federal Projects is presented to the project lead and reviewed in detail. The guide serves as a training manual and presents allowable, reasonable, and allocable expense information; how to document time and

effort for salary charges, and describes the purchasing policy. The project lead is also given the Direct Costs Allowability Matrix, which includes costs that are not allowable under Federal awards.

3. A project ID number is assigned to the grant award by the Associate Controller. The unique project ID number is used to segregate, by grant award, the budgeted and actual expenditures within GRCC's financial records. The Associate Controller also enters the annual budget into the general ledger under the assigned project number.
4. Weekly budget reports are generated for each project lead and their budget control officer (BCO). The reports are located in a folder with the BCO's name as it is assigned in PeopleSoft to grant/project ID by Financial Services (S:\Units\Financial Services\Reports\Organization). Project leads must review these reports weekly. The Grant Accounting Specialist also reviews these weekly.

Direct vs. Indirect Costs

All direct costs and indirect costs are determined during the proposal development phase. The information below is provided for your reference.

Direct Costs are costs that can be specifically documented by recordkeeping mechanisms and are directly allocated to a specific project.

The salaries of administrative and clerical staff should normally be treated as indirect costs. Direct charging of these costs may be appropriate only if all of the following conditions are met:

- Administrative or clerical services are integral to a project or activity.
- Individuals involved can be specifically identified with the project or activity.
- Such costs are explicitly included in the budget or have the prior written approval of the Federal sponsor.
- The costs are not also recovered as Indirect Costs.

Materials and supplies used for the performance of a sponsored project may be charged as direct costs. In the specific case of computing devices, charging as direct costs is allowable for devices that are essential and allocable, but not solely dedicated, to the performance of a Federal grant. Consistent treatment of costs is required on federal awards. A cost may not be assigned to a Federal grant as a direct cost if any other cost incurred for the same purpose in like circumstances has been allocated to the Federal grant as an indirect cost.

Indirect Costs are costs incurred for a common or joint purpose benefitting more than one cost objective, and not readily assignable to the cost objectives specifically benefitted, without effort disproportionate to the results achieved. Indirect Costs at higher education institutions are infrastructure costs of the college needed to support the programs of the institution, including other sponsored programs. Building depreciation, maintenance costs, the cost of electricity and heat, accounting services, personnel services, departmental administration, purchasing, and human subject administration are examples of indirect costs.

Consistent Treatment of Costs. Consistent treatment of costs is a basic cost accounting principle and is specifically required by the Uniform Guidance to ensure that the same types of costs are not

charged to federally-sponsored projects both as direct costs and as indirect costs. Consistency in this context means that costs incurred for the same purpose, in like circumstances, must be treated uniformly as either direct costs or as indirect costs. Although these are not the sole determining factors, the size, nature and complexity of Federally-sponsored projects are important considerations in determining circumstances for which exceptions are justified. Due to the unique requirements of each Federally-sponsored project, the existence of special circumstances must be evaluated on a case-by-case basis.

Determining Allowable, Allocable, and Reasonable Costs

As a recipient of Federal awards, GRCC is responsible for ensuring that costs charged to Federal grant projects and programs are allowable, allocable, and reasonable in accordance with the rules and regulations as set forth by Federal agencies, the Office of Management and Budget (OMB), and college policy. This section of the guide, establishes the definitions of allowable, allocable, and reasonable and how these standards are determined at GRCC.

Allowable Costs (§ 200.403). Except where otherwise authorized by statute, costs must meet the following general criteria in order to be allowable under Federal awards:

- (a) Be necessary and reasonable for the performance of the Federal award and be allocable under these principles.
- (b) Conform to any limitations or exclusions set forth in these principles or in the Federal award as to types or amount of cost items.
- (c) Be consistent with policies and procedures that apply uniformly to both federally-financed and other activities of the non-Federal entity.
- (d) Be accorded consistent treatment. A cost may not be assigned to a Federal award as a direct cost if any other cost incurred for the same purpose in like circumstances has been allocated to the Federal award as an indirect cost.
- (e) Be determined in accordance with generally accepted accounting principles (GAAP).
- (f) Not be included as a cost or used to meet cost sharing or matching requirements of any other Federally-financed program in either the current or a prior period.
- (g) Cost must be incurred during the approved budget period. The Federal sponsor is authorized, at its discretion, to waive prior written approvals to carry forward unobligated balances to subsequent budget periods pursuant to [§ 200.308\(e\)\(3\)](#).

Additionally, all costs must be adequately document. The OMB Uniform Guidance (§200.420 through §200.475) lists costs that are allowable and not allowable as an expense on a Federal award.

Reasonable Costs (§ 200.404). The following factors should be considered to determine if a cost is reasonable:

5. Whether the cost is of a type generally recognized as ordinary and necessary for the operation of the non-Federal entity or the proper and efficient performance of the Federal award.
6. The restraints or requirements imposed by such factors as: sound business practices; arm's-length bargaining; Federal, state, local, tribal, and other laws and regulations; and terms and conditions of the Federal award.

7. Market prices for comparable goods or services for the geographic area.
8. Whether the individuals concerned acted with prudence in the circumstances considering their responsibilities to the non-Federal entity, its employees, where applicable its students or membership, the public at large, and the Federal Government.
9. Whether the non-Federal entity significantly deviates from its established practices and policies regarding the incurrence of costs, which may unjustifiably increase the Federal award's cost.

Allocable Costs (§ 200.405). To determine whether costs are allocable to the Federal award, the standard is met if the cost:

- (a) Is incurred specifically for the Federal award. This standard is met if the cost: (1) Is incurred specifically for the Federal award; (2) Benefits both the Federal award and other work of the non-Federal entity and can be distributed in proportions that may be approximated using reasonable methods; and (3) Is necessary to the overall operation of the non-Federal entity and is assignable in part to the Federal award.
- (b) All activities which benefit from the non-Federal entity's indirect cost, including unallowable activities and donated services by the non-Federal entity or third parties, will receive an appropriate allocation of indirect costs.
- (c) Any cost allocable to a particular Federal award may not be charged to other Federal awards to overcome fund deficiencies, to avoid restrictions imposed by Federal statutes, regulations, or terms and conditions of the Federal awards, or for other reasons. However, this prohibition would not preclude the non-Federal entity from shifting costs that are allowable under two or more Federal awards in accordance with existing Federal statutes, regulations, or the terms and conditions of the Federal awards.
- (d) Direct cost allocation principles: If a cost benefits two or more projects or activities in proportions that can be determined without undue effort or cost, the cost must be allocated to the projects based on the proportional benefit. If a cost benefits two or more projects or activities in proportions that cannot be determined because of the interrelationship of the work involved, then, notwithstanding paragraph (c) of this section, the costs may be allocated or transferred to benefitted projects on any reasonable documented basis. Where the purchase of equipment or other capital asset is specifically authorized under a Federal award, the costs are assignable to the Federal award regardless of the use that may be made of the equipment or other capital asset involved when no longer needed for the purpose for which it was originally required.

Unallowable Costs (§ 200.420 through § 200.476). GRCC defines unallowable costs as those expenses, which are not reimbursable under the terms and conditions of federally-sponsored awards or agreements and/or those specifically identified as unallowable in the Uniform Guidance. Below is a partial list of specific costs that have been identified as unallowable:

- 1) Advertising and public relations (Some types of advertising, such as recruitment of students, may be allowable if the cost is either in the approved budget for the Federal award or with prior written approval of the Federal awarding agency.)
- 2) Alcoholic beverages
- 3) Bad debts
- 4) Commencement costs

- 5) Contributions and donations
- 6) Entertainment (Except where specific costs that might otherwise be considered entertainment have a programmatic purpose and are authorized either in the approved budget for the Federal award or with prior written approval of the Federal awarding agency).
- 7) Fines and penalties
- 8) Fundraising
- 9) Goods or services for personal use
- 10) Lobbying

This list is not all-inclusive and for further details regarding the Federal requirements, please review the Direct Costs Allowability Matrix and the Uniform Guidance, General Provisions for Selected Items of Cost §200.420 – 200.475.

Prior Written Approval (§ 200.407). Under any Federal award, the reasonableness and allocability of certain items of costs may be difficult to determine. In order to avoid subsequent disallowance or dispute based on unreasonableness or non-allocability, the project lead should work with the Grants Department to seek the prior written approval of the Federal sponsor in advance of the incurrence of special or unusual costs. Prior written approval should include the timeframe or scope of the agreement. The absence of prior written approval on any element of cost will not, in itself, affect the reasonableness or allocability of that element, unless prior approval is specifically required.

Compliance Review of Costs. To ensure that costs incurred and charged to Federal awards are allowable and reimbursable, costs must also be verified by someone in the position to know the appropriateness of the charge to the project (i.e., the project lead). The project lead therefore performs a review of all costs charged to the sponsored project in a timely manner to ensure allowability of costs in accordance the Uniform Guidance and/or the terms of the specific grant agreement/contract. The procedures are executed at the time GRCC is awarded Federal funds, during the processing of expenditures, and on a periodic basis. GRCC's Associate Controller also reviews actual and budget expenditures to verify that the amounts charged to a grant are within budget limits and within approved budget categories and to confirm compliance with allowability.

As well, all purchases must adhere to GRCC's [Purchasing Policy](#). In general, the project lead and their BCO are the first to approve purchases that are in line with the project's approved budget. BCOs are responsible for ensuring competitive quotes for purchases less than \$5,000.

Procedures

1. Prior to approving expenditures to be charged to a Federal award, the project lead is expected to confirm allowability of the expenditure using the training materials received at the post-award conference and Direct Costs Allowability Matrix.
2. If the project lead determine that the cost is allowable, invoices and documentation should be approved by the BCO and emailed to accountspayable@grcc.edu.
3. Prior to processing Federal award expenditures, the Associate Controller reviews the procurement documents to determine if: a) there is a budget for the specific expense type, b) there are budgeted funds available, and c) the costs were incurred within the approved period

of performance, or up to 90 days in advance of the period of performance if pre-award spending is approved by the Controller.

- The Associate Controller refers to the Direct Costs Allowability Matrix when the item(s) on the procurement document appears questionable in regard to allowability.
 - Any questions on budget availability or Federal cost allowability are directed to the project lead and to the Controller.
4. If a direct unallowable expenditure is identified, the expenditure is not charged to the award. The unallowable expenditure must be charged to the project lead's department.
 5. In the case of subawards, prior to processing by Accounting and Budget Services, the Associate Controller reviews invoices from subrecipients to determine if: a) there is a budget for the specific expense type, b) there are budgeted funds available, c) the costs were incurred within the approved period of performance, and d) the type of expenditure is allowable under Federal award regulations.
 6. Prior to processing by the Accounting and Budget Services Department, the Associate Controller reviews all expenditures to be charged to the participant support costs expense line items to ensure budget availability, Federal cost allowability, and correct expense allocation.
 7. If an expenditure for a line item is expected to exceed the line-item budget, the Associate Controller will contact the project lead to discuss/propose a line-item budget transfer. If required, the project lead will work with the Grants Department to seek approval from the Federal agency before line-item budget transfers are made.
 8. In the event that actual expenditures exceed budget expenditures for an award, **in total**, the amount in excess of the budget is charged either to the General Fund of Other Federal awards are **not** charged for cost overruns.
 9. When an expenditure is ready to be processed by the Accounting and Budget Services Department:
 - If the purchase meets all criteria and is <\$2,500, the Associate Controller approves the purchase.
 - If the purchase meets all criteria and is >\$2,500, the requesting grant BCO/project lead routes it to the Purchasing Department, who must formally approve purchases >\$2,500 via purchase order.
 10. On a periodic basis, the Grants Department and Associate Controller meet with GRCC project leads to review their project budgets. In addition to the review of costs, a comparison of expenditures with budget amounts is performed to verify budget accuracy and determine if a budget modification is necessary.

Unexpected or Extraordinary Circumstances. In unexpected or extraordinary circumstances, a sponsoring agency may direct a normally unallowable cost to be considered a direct cost for a specific program if the inherent purpose of the program requires it. This cost will be considered allowable if it satisfies the requirements for direct costs and is sufficiently documented. All costs charged to grants under these circumstances should be treated consistently, no matter the funding source (Federal or non-Federal).

Compensation – Personal Services

One of the largest expenditures charged to federal grants and contracts at GRCC is compensation

for personnel and fringe benefits. The College is responsible for ensuring that the compensation charged to Federal awards is reasonable for the services rendered, consistently applied to Federal and non-Federal activities, and properly allocated in accordance with the rules and regulations as set forth by Federal sponsors, the Office of Management and Budget (OMB), and College policy. The personnel and fringe benefit requirements can be found in 2 CFR 200.430 *Compensation – personal services* and 2 CFR 200.431 *Compensation – fringe benefits*. This section of the guide is intended to establish general guidelines to ensure that compensation (personnel and fringe benefits) charged to a Federally-sponsored project is in compliance with Federal regulations and the terms and conditions of the award.

Allowable Compensation Costs. Costs of compensation are allowable if they satisfy the following requirements:

- The cost is reasonable for the services rendered, conforms to established written College policy, and is consistently applied to both Federal and non-Federal activities.
- The cost follows an appointment made in accordance with the College's rules or written policies and meets the requirements of Federal statute, where applicable.
- The cost is determined and supported by the College's established written personnel policies and is adequately documented.
- The fringe benefits are reasonable and are required by law, College-employee agreement, or an established policy of GRCC.

Reasonableness of Compensation Costs. Salaries charged to sponsored projects must be consistent with compensation paid for similar work in other activities of the College. In cases where the types of employees required are not present at the College, salary should be comparable to that paid for similar work in the labor market as determined by Human Resources. Individuals working on sponsored projects should not receive higher rates of pay than other College employees who are performing the same work in similar circumstances, taking into account years of service, teaching experience, industry experience, military experience, or other factors. Salary increases for individuals whose positions are funded by a sponsored project must also be consistent with GRCC policy and must be supported by the approved grant budget.

Compensation Determinations. All salaries for grant-funded positions will generally be determined in accordance with established College policy. As such, **institutional base salary** is used to calculate salaries for sponsored projects and is determined based on the union-approved contract (i.e., Faculty Association, APSS, CEBA) or the employment terms and conditions provided in the Employee Handbook: Non-Union (Meet & Confer, Contingency). New employees will generally be hired at the starting rate assigned to their position. Supervisors may recommend higher or lower starting rates depending on an applicant's experience or skill level or other competitive considerations. These recommendations are reviewed and approved before implementation by the Executive Director of Human Resources as applicable.

Fringe benefits for grant-funded employees are the same as those provided to employees not funded by grants, and benefits for grant-funded positions are determined based on the union-approved contract or non-union employee handbook, and may include health, life, short and long-

term disability, and retirement. Eligibility depends on the specific requirements of the employee contract or non-union handbook and the specific benefit plan selected. GRCC also provides other benefits such as leaves of absence and paid time off, holidays, and sick days in accordance with the respective employee group contract or handbook.

Grant-funded positions will receive the same increases as might be received by regular College personnel so long as the increases are either 1) included in the approved grant budget, or 2) may be incorporated into the grant budget by reallocation of funds among budget categories and the budget modification is approved in writing by the sponsor.

Time and Effort Certification

Time and effort certification ensures salaries paid to individuals by Federal and other grants are consistent with the time and effort actually expended on the project. Adherence to this procedure is necessary to prevent cost disallowances and penalties by Federal and other sponsoring agencies. GRCC time and effort procedures employ “after-the-fact” certification and reporting to confirm salaries paid match the level of effort charged to Federally-funded activities. Time and effort reports are critical in the audit process, as they ensure compliance with the level of effort agreed to in the grant agreement and document any committed cost share effort.

Standards for Documentation of Personnel Expenses. Costs charged to Federal awards for salaries and wages must be based on records that accurately reflect the work performed. Records must:

- Be supported by a system of internal control which provides reasonable assurance that the charges are accurate, allowable, and properly allocated.
- Be incorporated into the official records of the College.
- Reasonably reflect the total activity for which the employee is compensated by the College.
- Encompass both Federally-assisted and all other activities compensated by the College on an integrated basis, but may include the use of subsidiary records as defined in the College’s written policy.
- Comply with the established accounting policies and practices of the College.
- Support the distribution of the employee's salary or wages among specific activities or cost objectives if the employee works on more than one federal award.
- It is recognized that teaching, research, service, and administration are often inextricably intermingled in an academic setting. When recording salaries and wages charged to federal awards, a precise assessment of factors that contribute to costs is therefore not always feasible, nor is it expected.

GRCC’s Time and Effort Certification Form records the percentage of effort reported for a given period to substantiate the salaries and wages charged to the grant(s). This form provides a system of budgeted, planned, or assigned work activity that is incorporated into the official records of the institution and encompasses both grant-funded and all other activities on an integrated basis. It should be noted that effort documentation is not based on a 40-hour work week. Instead, effort is calculated based on 100% of activities. Effort must be reported, even if not paid for by the sponsor.

Example 1 (calculated by hours worked): If a staff member works 50 hours per week during an effort certification period and 10 of those hours are devoted to a specific grant project, total effort assigned to that project would be 20% (10 hours of work/50 hours total = 20% of the total direct effort for that period).

Example 2 (calculated by salary breakdown): If a staff member's compensated effort for a January through June period is \$50,000 total, and \$10,000 was charged to a grant fund (grant #1), \$5,000 to cost share on a different grant project (grant #2), and \$35,000 to GRCC's general fund, the effort report will show the following distribution of salary:

- 20% effort to Grant #1 (\$10,000/\$50,000)
- 10% effort to Grant #2 (\$5,000/\$50,000)
- 70% effort to General Fund (\$35,000/\$50,000)

Time and Effort Forms must be certified with a signature from a supervising administrator ("certifier"). All effort certifiers must directly supervise the work performed or be knowledgeable of the grant activities. To have sufficient knowledge of the grant activities, absent direct supervision, the certifier must have written documentation sufficient to support a reasonable estimate of effort by an employee. Oral verification is NOT support for having sufficient knowledge.

All documentation used to provide sufficient knowledge must be retained for audit purposes to support certification, consistent with the college's record retention requirements. In any audit situation, it is the responsibility of the person certifying the effort to support that all certification requirements were met and provide the appropriate documentation. Examples of allowable forms of documentation:

- Calendar - detailed
- Meeting documentation - agenda, notes, minutes, attendees list
- Time and attendance sheets/Sign-in sheets
- Leave of Absence approvals/travel documentation
- Award work products – Presentations, reports or analyses completed, surveys/interviews conducted, events held, log of services performed, published documents
- Other written documentation – memos, email

Note: For grant-funded projects wherein GRCC is a subrecipient, submission of a Time and Effort Certification Form alone does not initiate payroll disbursements from a subaward to the employee who is conducting the grant-funded work. In such instances, the project lead must initiate payroll disbursements via their department process.

Procedures

1. The [Time and Effort Certification Form](#) must be completed on a bi-weekly basis for all Federal projects. Activity categories that constitute a full workload are determined on a project-by-project basis. Therefore, the form must reflect categories of activities expressed as a percentage distribution of total activities.
2. The completed form must be signed by the faculty or staff member and a supervising administrator to certify that the work was performed, and stating that salaries and wages

charged to the grant as direct charges and to indirect or other categories are reasonable in relation to work performed.

3. Signed forms should be sent to the Grant Accounting Specialist.

Participant Support Costs

An approved Federal project budget may include participant support costs. GRCC recognizes that there are specific restrictions placed by sponsors relative to the handling of participant support costs, and thus, the college adheres to Federal regulations in the treatment of participant support costs. **Participant support costs are defined as** “direct costs for items such as stipends or subsistence allowances, travel allowances and registration fees paid to or on behalf of participants or trainees (but not employees) in connection with conferences or training projects” (2 CFR 200.75).

Important Details:

- Participant support costs are allowable with prior approval from the awarding Federal sponsor (2 CFR 200.456).
- GRCC segregates participant support costs in financial records and does not allow transfers of budgeted participant support cost dollars into other line-item categories. The transfer of funds budgeted for participant support costs to other budget categories always requires the prior approval from the Federal sponsor (2 CFR 200.308).
- Participant support costs are excluded from modified total direct costs; therefore, indirect costs are not charged on participant support costs (2 CFR 200.68).

Who can be a participant?

A participant is someone who is receiving a service or training opportunity from a federally-funded training project, meeting, conference, workshop, seminar, symposium, information-sharing activity, or short-term instructional activity that is funded under a sponsored project. A participant can be a GRCC student, a student from another postsecondary institution, a private organization/company representative, or state or local government agency personnel. Participants perform no work or services for the project or program other than for their own benefit; they are not involved in providing any deliverables to the college or a third party.

A participant is NOT:

- An employee of the college.
- A student or project staff member who is receiving compensation directly or indirectly from the sponsored project.
- A research subject receiving incentive payments.
- A recipient of any compensation from any other Federal government sources while participating in the project.

Examples of what may be included as participant support costs:

- Event registration fees.
- Event support costs for lodging and meal expenses paid directly to the event facility, only if the payment is made on behalf of, or reimbursed directly to the participant.
- Tuition if required to participate in project.

- Laboratory or training materials, if required. This may include specific tools or uniforms when required for participants in workforce training projects to participate in the training. These costs must be explicitly described in the approved budget justification to be eligible.
- Stipend – a predetermined amount to be paid directly to participant.
- Travel costs when the sole purpose of the trip is to participate in the project activity.
- Meals and incidentals when on travel status.
- Wraparound support (e.g., transportation vouchers, emergency grants) if necessary to participate in the project-sponsored workforce training program. These costs must be explicitly described in the approved budget justification to be eligible.
- Subsistence allowance – a predetermined amount to assist with costs (e.g., lodging, meals, and laundry) necessary to participate in the project. Note that local area participants are exempt from having these costs covered.

Examples of costs that are not considered participant support costs:

- Payments to trainees who are receiving compensation, either directly or indirectly, from other Federal government sources while participating in the project.
- Room rental and related expenses (e.g., presentation technology support).
- Payments made to research subjects as an incentive for recruitment or participation in a research project.
- Guest speaker consultant costs, including consultant fees and related expenses such as travel, etc.
- Expenses for the project lead, project staff, or collaborators to attend meetings, conferences or seminars.

Procedures

1. Upon receipt of the grant award notification, the Associate Controller will coordinate input of the budget into GRCC's enterprise system. The budget amounts for participant support costs are entered into the subclass accounts of: 2584 and 2585.
2. Expenditures for participant support costs are charged to the appropriate general ledger object codes via invoices, check requests, or financial aid awards.
3. Requests for cash payments of participant support stipends are reviewed by Accounts Payable to ensure that no participant support costs are being paid to, or for, a GRCC employee.
4. The project manager determines the eligibility of participants and maintains records of eligibility and attendance/participation for activities or events for which participant support will be paid. The project manager forwards attendance/participation lists to the Associate Controller to assist with the review of participant support cost expenses.
5. Prior to processing by the Accounting and Budget Services Department, the Associate Controller reviews all expenditures to be charged to the participant support expense line items to ensure budget availability, Federal cost allowability, and correct expense allocation.
6. A request for a transfer **from** the budgeted line items of participant support costs to a different expense line item is discussed with, and reviewed by, the Grants Department.
 - The Grants Department and project lead submit a request for a transfer from the budgeted amount of participant support costs to a different budget line item in total, or between subcategories, to the Federal program officer, including reasons for the revision.

- Upon approval of the transfer from the Federal program officer, the Grants Department requests the Associate Controller to revise the budgeted amounts in GRCC's enterprise system.
 - Upon receipt of the request from the Grants Department and the written approval from the Federal sponsor, the Associate Controller processes a revision to the budgeted line items affected by the request.
7. A request for a transfer to the budgeted line items of participant support costs from a different line item is discussed with, and reviewed by, the Grants Department and Associate Controller.
- The Grants Department and project lead notify the Federal program officer of the budget revision (if required), including the reason(s) for the revision.
 - Upon approval from the Federal program officer, the Grants Department requests the Associate Controller to revise the budgeted amounts in GRCC's enterprise system.
 - Upon receipt of the request from the Grants Department, the Associate Controller processes a revision to the budgeted line items affected by the request.

Purchasing Department

The GRCC Purchasing Department has developed and maintains an efficient and fair procurement process that is in accordance with Federal and state procurement regulations and encourages the inclusion of all suppliers.

The Purchasing Department serves the needs of the college for all purchases in excess of \$2,500, as outlined in the [Purchasing Policy](#). Responsibility and authority to make commitments for these purchases are assigned to the Purchasing Department. The director of purchasing, or a delegate, must give authorization when the purchase, lease, or agreement is \$5,000 or more. The procurement specialist will give authorization when the purchase is less than \$5,000. This includes all contacts with suppliers regarding price, delivery, terms, quantity requirements, environmental impact or other matters of a contractual nature. The college is not obligated to pay for any purchases made that are not consistent with this policy. For more information, visit their [webpage](#) or contact a procurement specialist.

Documenting Match/Cost Share or Leveraged Funds

If match/cost share or leveraged funds were included in the proposed budget, these financial commitments become binding requirements of the award and costs must be monitored for compliance. During the post-award meeting, match or cost sharing requirements and associated reporting will be discussed.

Criteria to qualify as match/cost share per 2 CFR 200.306(b), match must:

- Be **verifiable** in recipient records
- Not used to support another Federally-funded program
- Necessary and reasonable
- An allowable cost under "Cost Principles"

- Not paid with Federal funds
- Provided for in approved budget and allowable under the grant
- Conform to other applicable Uniform Guidance provisions

The project lead must work closely with the Grant Accounting Specialist to ensure that in-kind and match/cost sharing funds are allocable and available and properly documented. For instance, funds cannot be used for match or cost sharing on multiple grants, and Federal funds cannot be matched with other Federal funds. ALL cost sharing commitments must be documented and the documentation must meet audit standards.

Procedures

1. Project lead will send copies of invoices, student accounts from PeopleSoft and other evidence of cost share/match or leverage to the project's administrative professional (or other assigned staff member) weekly. The administrative professional will review the documentation to provide a cross-check that it meets sponsor guidelines. If so, the information will be recorded in the Cost Share/Leveraged Tracking Sheet and the documentation will be scanned and saved to the electronic grant file.
 - If the cost share/leverage reporting does not match, or adequate evidence is not provided, the information will be returned to the project lead and nothing will be recorded until the information can be validated.
2. On a monthly basis, the project lead and the project's administrative professional (or other assigned staff member) will meet with the EBCO to review the cost share/leveraged tracking to ensure nothing is missed and back-up materials are available to support the tracking. The EBCO will ensure cost share/leverage funding meets the quarterly goals outlined in the proposal.
3. Thirty days after the end of the quarter, the Cost Share/Leveraged Tracking Sheet that was approved by the project lead and EBCO will be shared via email with the Grant Accounting Specialist.
4. The Grant Accounting Specialist will validate the cost share/leveraged funding and use that information to complete the required Federal forms, and other sponsor reports as needed.

Procedures for Tracking Subrecipient Cost Share/Leveraged Funds

1. Subrecipients must include proof of cost share/leverage in their monthly billings to GRCC. The billing will be reviewed by the project lead to ensure evidence of the cost share/leveraged funds.
2. Approved cost share/leveraged funds documentation will be provided to the project's administrative professional (or other assigned staff member), who will review the documentation to provide a cross-check that it meets sponsor guidelines. If it does, the information will be recorded on the leveraged funding spreadsheet and documentation will be scanned to the One Workforce electronic grant file. If the leverage reporting does not match, or evidence is not provided the information will be returned to the staff member and nothing will be recorded until the information can be validated. If so, the information will be recorded in the Cost Share/Leveraged Tracking Sheet and the documentation will be scanned and saved to the electronic grant file.

- If the cost share/leverage reporting does not match, or adequate evidence is not provided, the information will be returned to the project lead and nothing will be recorded until the information can be validated.

Budget Modifications

Grant funds may only be expended in the line-item categories and amounts listed in the approved grant budget. The approved budget, whether negotiated with the grantmaking agency or approved as proposed, constitutes part of a legal contract.

Line-item modifications. Federal and state guidelines are usually flexible enough to allow minor (± 10 percent of the total award) line-item changes within the total budget without prior approval from the program officer. If a larger change is anticipated, discuss the changes with the Grant Accounting Specialist **before making a commitment to purchase.**

Procedures

1. The project lead notifies the Grants Department of the need for a budget modification.
2. The Grants Department reviews the grant agreement, including the terms and conditions of a Federal award, as well as 2 CFR 200.308 if a Federal award, to determine if prior approval for a budget revision is required from the sponsor.
 - If you plan to transfer funds among the grant budget categories, it must receive prior approval from the Federal program officer when the cumulative amount of those transfers would exceed 10 percent of the total award.
3. If prior approval is required, the project lead, working with the Grants Department, drafts a revised budget justification that the project lead sends to the Federal program officer to request written approval of the modification.
4. Upon written approval of the budget modification, the project lead requests that the revision be made in GRCC's enterprise system by providing the Grant Accounting Specialist with the revised budget spreadsheet and budget justification and a copy of the written approval.
5. The Grant Accounting Specialist revises the budget in the enterprise system.

Upon receipt of the request, the sponsor's program officer will officially approve or deny the change in writing. **No budget changes may be made until official, written approval is received.** This may take several weeks, so it is important to make adjustments as early as possible. The Grant Accounting Specialist will use the PeopleSoft transaction process to make the budget change, which will result in the weekly budget reports on the S: drive being updated with new budget figures. You must forward the revised budget and copies of approval letters to the Grant Accounting Specialist.

Carryovers. Carryover is the process by which unobligated funds remaining at the end of a budget period may be carried forward to the next budget period to cover allowable costs in that budget period. The carryover of funds enables grantees to use unexpended, prior-year grant funds in the current budget period. This requires approval from the sponsor.

No-cost extensions. A no-cost extension is a request to extend the project period beyond the previously approved end date and for which no additional funds are granted beyond what was

originally approved for the award. **The project lead must pay close attention to the deadline for submitting a no-cost extension request** and note the information that will be required for making such a request. It should be noted that some programs do not allow no-cost extensions.

No-cost extensions require written justification based on achieving the project objectives and a discussion about the projection of how much money will remain at the end of the grant period and how the funds will be used. The fact that you haven't spent all of the funds is **never** an adequate justification for the request.

The following information must be submitted to the Grants Department and Grant Accounting Specialist to begin the process of requesting a no-cost extension:

- Number of months for the extension
- Proposed budget period end date
- Proposed project period end date
- Amount of unobligated balance
- Current progress - e.g., What activities or performance outcomes must still be achieved?
- Full budget document
- Justification/rationale for the requested extension

Programmatic Changes

If you anticipate needing help with any of the following changes, please reach out to the Grants Department as soon as possible.

Personnel changes. During the project period, it may be necessary to change grant-funded personnel or to adjust salary rates. Most Federal sponsors, as part of the terms of the grant contract, have strict procedures requiring prior approval of personnel changes that must be adhered to. The Grants Department will provide technical assistance as needed to the project lead in obtaining approval from the sponsor's program officer for personnel changes.

Changes in project scope. Changes in the scope, objectives, or goals of the project—whether or not they involve budgetary changes—are rare and always require written permission from the sponsor's program officer. In most cases, a fully substantiated justification for the changes will need to be provided, in writing, to the program officer in order to request permission for these types of changes. The Grants Department will provide technical assistance to the project lead in obtaining approval from the sponsor for changes to the project's scope.

Required Reporting

Reporting requirements are specified in your grant agreement. While some grants require interim reporting, others require only end-of-year narratives and fiscal reports. Some sponsors require both. For all non-Federal grants, the Grants Department will send reminders that reports are due based on funding source requirements. A schedule for preparation and submission of reports will be determined during your post-grant award meeting. If you are leading a Federal grant, the Federal sponsor will send reminders.

It is your responsibility as the project lead to keep adequate records, prepare all reports on time as outlined in the grant agreement, and to work with the Grants Department to obtain the necessary signatures on report documents.

Narrative Reports

While the project lead is responsible for preparing narrative reports, **it is recommended that all reports be reviewed by the Grants Department.** In some cases, this review will be required such as for reports to local foundations. Reports should be provided to the Grants Department a minimum of five (5) working days prior to the due date to allow for adequate review time.

The project lead should work closely with the Institutional Research Department to plan adequate time for compiling and analyzing project data.



Successfully prepare the narrative program report by following these tips.

- FOLLOW ALL INSTRUCTIONS. Note if there are word or page limits, or direction to use a specific font or margins. Take care to fully address the specific questions posed.
- Review the guidelines in your grant agreement to ensure that each goal, objective, and activity that you identified in the proposal is addressed.
- If there were unanticipated challenges or goals were not fully attained, these exceptions must be clearly explained.
- When completing a grant report, be clear and concise. Tie your outcomes directly to your goals.

Financial Reports

The Grant Accounting Specialist must prepare all fiscal reports or verify the accuracy of reports (i.e., reports must be in accordance with the ledger). Fiscal reports generally consist of a spreadsheet displaying the final approved grant budget alongside the expended budget. Issues occasionally arise when attempting to reconcile the differences between the sponsor's and the college's budget line items.

Procedures

1. The Grant Accounting Specialist prepares financial reports and submits them to the sponsor in the data collection format and by the deadline required. The source of the data included in the financial reports are summary financial revenue and expense reports generated from GRCC's enterprise system. Details of each line item on the system reports are available when needed.
2. If the sponsor requires a combined financial and performance report, the project lead prepares the performance report after obtaining the financial information from the Grant Accounting Specialist.
3. Upon receiving a request from a Federal agency or other sponsor for documentation that relates financial data to performance accomplishments, the project lead must coordinate a response with Accounting and Budget Services Office and Grants Department.

Internal Annual Monitoring

As stewards of external funds, GRCC must be sure that project implementation is being carried out according to the grant agreement and project timelines submitted as part of the proposal. By monitoring the progress of grant activities and compliance with rules and regulations, the college is working to secure strong relationships with sponsors and ensure access to future funding opportunities.

Procedures

1. The Grants Department will send you an email invitation about one month in advance of the scheduled date in order to give you time to prepare. All file reviews are conducted in person, unless there are extenuating circumstances.
2. Reviews take approximately 1 to 2 hours depending on the complexity of the grant project.
3. Please have your files readily accessible for the Grants Department to review.
4. While this review will not include a detailed review of any financial records, the Grants Department will want to understand your process for keeping those files up-to-date. Financial records are monitored by the Grant Accounting Specialist.

Audit Readiness

When an organization receives external grant funds—particularly state or Federal funds—it is responsible for using those funds in accordance with laws and regulations. The recipient must use fiscal control and accounting procedures to ensure the proper disbursement of, and accounting for, these funds. The effective management of public and private funds should be a result of ongoing activities that ensure audit readiness, such as:

- **Administrative controls:** The plan of organization and procedures and records related to authorizing transactions.
- **Accounting controls:** The plan of organization and procedures and records concerned with assets and reliable financial records.
- **Compliance with Federal and state requirements:** Such as charges for direct labor, reporting of financial status, treatment of grant-related income, eligibility of participants, monitoring of activities, and allowability of services.
- **Records:** Should include information adequate to support statements in the proposal and should be retained for the required period of time. The Grants Department will review your project records during annual file reviews.
- **Internal audits:** May be requested by the grantmaking agency to help determine whether controls are adequate.

Common Audit Findings

The most common audit findings are shown in the table below. While not intended to be all-inclusive, the information is intended to increase awareness of potential areas of concern.

Common Audit Findings	
<ul style="list-style-type: none"> • Noncompliance with assurances and special terms and conditions of award • Inadequate subrecipient monitoring • Missing acknowledgement of the sponsor on 	<ul style="list-style-type: none"> • Changes were made to the statement/scope of work without program officer approval (outcomes, activities, adding/removing a partner, etc.) • The Equal Opportunity (EO) requirements are not

<p>program materials; Similarly, Brochures/outreach materials do not contain the required wording</p> <ul style="list-style-type: none"> • Significant delays in achieving grant outcomes • Equipment was purchased without program officer approval • Procurement files do not contain the required support documentation 	<p>being fully implemented:</p> <ul style="list-style-type: none"> ➤ The EO notice does not contain the required wording ➤ EO notice is not posted or provided to participants and made a part of their file • Delinquent financial and progress reporting • Delinquent closeout reporting
Common Budget-Related Audit Findings	
<ul style="list-style-type: none"> • Unallowable costs charged to grant • Excessive cost transfers • Inaccurate administrative and clerical costs • Misallocation of costs—amounts expended in unapproved or other cost categories without required prior written approval from the grantmaking agency 	<ul style="list-style-type: none"> • Lack of time records to support salary costs charged to awards • Inaccurate time and effort reporting • Lack of consulting agreements and invoices to support that the services were related to the award and that the charges were reasonable • Budget realigned without agency approval
Common Audit Findings Related to Match, In-Kind, Cost Sharing	
<ul style="list-style-type: none"> • Cash and in-kind amounts unsupported by adequate documentation or not verifiable by institutional records • Using other Federal funds as match, where the funds are restricted and cannot be used to match other Federal grants • Match claimed on Federal Financial Report (FFR) based on estimates, not actual amounts incurred 	<ul style="list-style-type: none"> • Costs charged that were based on estimated, rather than actual, incurred costs • Match expense incurred outside of grant award period • Match amounts unreasonable or excessive • Match deemed unnecessary to operate the grant • Claimed match that was not in the approved grant budget

Section 4: Closeout

Conclusion of the Project

Closing out the grant project involves making sure that all grant activities have been accomplished. **It is highly recommended that you review the Grant Closeout Checklist at least six (6) months prior to the end date of your project.** If you do not anticipate that the project will be completed on time, determine if no-cost extensions are allowed. Contact the Grants Department and Grant Accounting Specialist for technical assistance if a no-cost extension is to be requested.

PROGRAMMATIC CLOSEOUT

1. If a sustainability component was required by the sponsor, document how sustainability was, or will be, achieved.
2. Confirm sponsor-required procedures for record retention.
3. Submit the final program and evaluation reports to the sponsor by the required deadline and in the requested format. For Federal awards, the reports should be submitted no later than 120 calendar days (in some cases, it is 90 days) from the award end date, unless otherwise provided for within the terms and conditions of the Federal award agreement.

If your grant has subrecipients:

1. Notify all subrecipients in writing to communicate the closeout requirements noted in the subaward agreement. Remind them of deadlines for final invoices to be processed, performance and financial reports that will be due, and records retention policies. Identify the deadline for completion of closeout activities, the individual at GRCC to whom documentation should be sent from the subrecipient, and the method by which documentation is to be submitted to GRCC.

BUDGET CLOSEOUT

1. Meet with the Grant Accounting Specialist 90 days prior to the end date of the award to review the closeout deadlines, procedures, and any transaction types that are considered allowable or unallowable based upon the specific terms and conditions of each respective award. Identify all outstanding invoices.
2. Review with the Grant Accounting Specialist all encumbrances associated with the award as of the end of the period of performance. Coordinate with the Grant Accounting Specialist to schedule payment of the costs within 120 calendar days of the period of performance end date or confirm that the encumbrance is to be closed by the Purchasing Department.
3. If applicable, monitor receipt of final subrecipient invoices to ensure timely review and processing.
4. One month prior to closeout, reconcile journal entries/line items with the Grant Accounting Specialist and process adjustments.
5. If the sponsor was a Federal agency, determine with the Grant Accounting Specialist if there is a residual inventory of unused supplies.
 - If supplies exceeding \$1,000 in total aggregate market value are left over upon expiration of the grant or subgrant for which they were acquired and the supplies are not needed for any project or program currently or previously sponsored by the federal government, the

grantee may retain or sell them, paying the granting agency its share of the market value or sale proceeds. If sold, grantees may deduct from the federal share the greater of \$100 or ten percent of the proceeds as selling expenses. The balance due is remitted to the sponsor by check.

- If, at the end of the grant, the residual value of supplies is \$1,000 or less, the grantee may, at its option, either retain or sell the property without compensating the federal agency.
 - ***Grantees should be careful not to build up an overly large inventory of supplies, particularly if the value greatly exceeds \$1,000. These costs could be considered unallowable under the cost principle rules which stipulate that costs must be reasonable and necessary.***
6. Review equipment purchases with the Grant Accounting Specialist. When original or replacement equipment is no longer to be used in projects or programs currently or previously sponsored by the Federal government, disposition of equipment shall be made as follows:
 - **Equipment less than \$5,000:** Equipment with a unit acquisition cost of less than \$5,000 may be retained, sold, or otherwise disposed of, with no further obligation to the federal government.
 - **Equipment greater than \$5,000:** Equipment with a unit acquisition cost of \$5,000 is usually retained or sold, with the Federal government entitled to an amount calculated by multiplying the current market value or the proceeds from the sale by the Federal share of the equipment. Of the amount due, \$100 or 10 percent of the total sales proceeds (whichever is greater) may be deducted from the amount due for handling charges. The balance of money due will be remitted to the sponsor by check. In some very limited instances, the Federal agency may reserve the right to transfer equipment costing \$1,000 or more. When this is the case, the award terms will stipulate so and specifically identify the property affected. This right lapses if it is not exercised before other permissible disposition takes place or before 120 days after the end of the grant. If the granting agency exercises this right, the grantee must be paid for the non-federal share of the market value plus shipping costs.
 7. Ensure all institutional cost share/match/leverage documentation is submitted to the Grant Accounting Specialist.
 8. Confirm with the Grant Accounting Specialist that all and Effort Certifications Forms are completed and certified.
 9. Coordinate with the Grant Accounting Specialist to submit the final financial reports. For Federal awards, the reports should be submitted no later than 120 calendar days from the award end date, unless otherwise provided for within the terms and conditions of the Federal grant agreement.
 10. After all expenditures have been posted to the general ledger, send an email to the Controller requesting that the project be inactivated on the general ledger.

PERSONNEL

Ninety days prior to the termination date of grant:

1. If there are full-time employees charged to the grant award, at least 90 days prior to the award termination date, notify Human Resources that the grant will be terminating and the end date.

- If there are full-time employees charged to the grant award, HR will notify the grant-funded employees of the position elimination in accordance with the handbook or contract. The notification will include notice of GRCC's accrued vacation policy.

Thirty days prior to the termination date of grant:

1. Verify with HR that each employee who was previously charged to the grant award will be processed as a separation or transfer to a different position and budget.
2. Notify the Provost and Dean via email of the grant's termination date to ensure no time and effort is charged after the award termination date.
3. Contact IT via email to cancel the telephone extensions, begin the process of returning equipment, etc. Regarding college IT accounts:
 - **Network Accounts:** To have access removed from an employee's network account, supervisors should fill out the Employee Separation service form upon transfer to another department, separation with the college, or retirement. This would include access to systems such as Peoplesoft, Web Editing Access, Document Imaging and shared Network Drives. To submit an Employee Separation, visit the IT Customer Support Portal.
 - **Google Team Drive:** IT has empowered managers of Google Team Drives to update access for their employees.
 - **Email:** An employee's email access will automatically be removed when an Employee Separation request is processed. Separations are processed on the effective date which is typically the day after the employee's last day. Supervisors should coordinate with their employee before the date of separation to transfer important departmental emails.
 - Lastly, IT strongly encourage managers to have their employees share the content of their Google Drive, J Drive, or GRCC email that may be relevant to their position as it becomes difficult to recover after someone leaves GRCC.

Records Retention

Record Retention for Federal Grants: As a prime recipient of grant funding from Federal agencies, the college and its subrecipients must follow Federal guidelines on record retention, which require that financial records, supporting documents, statistical records, and all other non-Federal entity records pertinent to a Federal award (including documentation from any subrecipients) must be retained for a specific period of time per 2 CFR 200.334. That required period is three years, either from the date of submission of the final expenditure report to the Federal awarding agency or, for Federal awards that are renewed quarterly or annually, from the date of submission of the quarterly or annual financial report, respectively. For subrecipients, the three-year period begins on the date of submission of its final financial report to the pass-through entity.

GRCC adheres to the 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 years. More specifically, Federal rule 2 CFR 200.333 states the following with respect to record retention:

Financial records, supporting documents, statistical records, and all other non-Federal entity records pertinent to a Federal award must be retained for a period of three years from the date of submission of the final expenditure report or, for Federal awards that are renewed quarterly or

annually, from the date of the submission of the quarterly or annual financial report, respectively, as reported to the Federal awarding agency or pass-through entity in the case of a subrecipient. Federal awarding agencies and pass-through entities must not impose any other record retention requirements upon non-Federal entities. The only exceptions are the following:

- 1) If any litigation, claim, or audit is started before the expiration of the 3-year period, the records must be retained until all litigation, claims, or audit findings involving the records have been resolved and final action taken.
- 2) When the non-Federal entity is notified in writing by the Federal awarding agency, cognizant agency for audit, oversight agency for audit, cognizant agency for indirect costs, or pass-through entity to extend the retention period.
- 3) Records for real property and equipment acquired with Federal funds must be retained for three years after final disposition.
- 4) When records are transferred to, or maintained by the Federal awarding agency or pass-through entity, the 3-year retention requirement is not applicable to the non-Federal entity.
- 5) Records for program income transactions after the period of performance. In some cases, recipients must report program income after the period of performance. Where there is such a requirement, the retention period for the records pertaining to the earning of the program income starts from the end of the non-Federal entity's fiscal year in which the program income is earned.
- 6) Indirect cost rate proposals and cost allocations plans. This paragraph applies to the following types of documents and their supporting records: indirect cost rate computations or proposals, cost allocation plans, and any similar accounting computations of the rate at which a particular group of costs is chargeable (such as computer usage chargeback rates or composite fringe benefit rates).
 - (a) If submitted for negotiation. If the proposal, plan, or other computation is required to be submitted to the Federal government (or to the pass-through entity) to form the basis for negotiation of the rate, then the 3-year retention period for its supporting records starts from the date of such submission.
 - (b) If not submitted for negotiation. If the proposal, plan, or other computation is not required to be submitted to the Federal government (or to the pass-through entity) for negotiation purposes, then the 3-year retention period for the proposal, plan, or computation and its supporting records starts from the end of the fiscal year (or other accounting period) covered by the proposal, plan, or other computation.

Disseminating Project Results

One of the final activities to consider as the project comes to a close is how the grant team will disseminate the evaluation results or capture “lessons learned” in a way that will inform ongoing practices. In some cases, the proposal may have included a dissemination plan that outlines what, when, how, and to whom this information should be disseminated. Use this plan to ensure that the required information has been sent to the appropriate professional organizations and publications, and to schedule presentations based on the project results at national, regional, and local meetings and conferences. In some cases, it may be necessary, per the grant contract, to disseminate or make specific products publicly available such as the project's model, handbooks and manuals, or

evaluation instruments. **Be sure to credit the sponsor where necessary when creating materials for the public.**

If the proposal did not include a dissemination plan, the project results may be disseminated to appropriate professional organizations and publications, shared via presentations at statewide and regional conferences, and by way of a web page. At a minimum, all project materials and results should be submitted to the grant-making entity, GRCC faculty and staff, and partner organizations that were involved with the project. Finally, internal dissemination of best practices can be achieved by contacting GRCC's Center for Teaching Excellence to schedule a workshop or presentation for GRCC colleagues.

Appendices

Appendix A: Checklists

Appendix B: Tips for Successful Project Management

Appendix C: Grant-Related Definitions

Appendix A: Checklists



Grants and Resource
Development Department

Grant Start-Up Checklist

Award & Contract Processing

- Inform the Grants Department about your grant award. Forward a copy of the award letter to the Director of Grant Development and keep a copy for your files.
- Carefully review the grant proposal and your award letter to verify the award amount, the budget breakdown, timelines, and reporting requirements.
- Work with the Grants Department and the Grant Accounting Specialist to negotiate the budget and/or project details with the program officer, as applicable.
- Work with the Grants Department to coordinate the signature process to fully execute the grant contract by obtaining authorized signatures in a timely manner. Forward a copy of the signed contract and final grant budget to the Grants Department. Keep a copy for your files.
- Review the sponsor's policy on publicity. Contact the Communications Department to discuss a press release and print materials. Be sure to credit the sponsor.
- Start a grant file, if you have not already done so.
- Make note of important deadlines and set up a process to generate reminders of the dates:
 - Interim and final narrative reports.
 - Interim and final financial reports.
 - Deadlines for requesting project or budget modifications.
 - Deadline for requesting a carryover or no-cost extension.
- Contact the Human Resources Department to initiate the process of hiring of grant-funded employees.
- Review the proposed evaluation plan and implement routine data collection activities. Contact the Institutional Research Department for assistance, as needed.
- Establish baseline data (as outlined in your proposal) and a platform for securely housing the project data (i.e., a proprietary database purchased from a vendor, etc.).
- File Institutional Review Board (IRB) paperwork if the evaluation activity involves human subject's research. Your IRB application must be approved before research activities commence.

Budget Processing

- Schedule a meeting with the Grant Accounting Specialist and your department BCO to:
 - Review the final grant budget.
 - Establish project start and end dates.
 - Discuss funding draw down and invoicing procedures.
 - Establish dates for financial reporting compliance according to the grant agreement/contract.
 - Review issues, policies, and procedures pertaining to equipment and supply purchases and consultant contracting, as applicable.

- Establish sub-recipient contracts and monitoring, as applicable.
- Register for PeopleSoft training, as applicable, by visiting the Accounting and Budget Services web page and completing the [Networking Account Provisioning Form](#).
- Verify that budgeted line items for the project have been established in PeopleSoft account codes by the Grant accounting specialist.
- Review the allowable expenditures in the grant budget before making a purchase, contracting with a vendor, or charging the grant for travel expenses. All expenditures must be allowable and compliant with the final approved grant budget, and must also comply with college policy.
- Complete a Time and Effort Certification Form for each individual working on the grant and return it to the Grant Accounting Specialist at the start-up of the grant and bi-weekly thereafter as required by the grant award/contract.
- The Grant Accounting Specialist will provide account availability reports (on the S: drive) that are updated regularly. Review these reports on a regular, ongoing basis.
- Add fiscal report deadlines to your calendar. Remember that budget reports must comply with grant narrative and data reports.

Project Information

Date:	Time period covered:
<hr/>	
Project title:	<hr/>
Award amount:	<hr/>
Project director:	<hr/>
Project staff:	<hr/>

Administrative Files Checklist

- Grant Management Guide (available on the Grants Department web page)
- Original application submission documents
- Final, revised proposal and budget, if amended
- Original award documents (fully executed) and amendments or approvals
- Fully-executed grant contract
- Memoranda of understanding with partners
- Closeout documents, if applicable

Budget Files

- In-kind, matching, and cost sharing commitments that are included in the Federal budget
- Invoices and copies of receipts for purchases made with grant monies
- Requests for budget modifications or no-cost extensions
- Audit reports
- Budget reports

Project Implementation Files

- Project timeline/implementation timeline/plan of work from original proposal
- Grant correspondence with the funding agency
- Grant personnel files, including Time and Effort Forms
- Participant files
- Sub-grantee monitoring reports and other

Reporting/Evaluation Files

- Evaluation plan/timeline
- External evaluator contract, if applicable
- Goals, objectives, outcomes, performance measures
- Data collection methods:

- Data sources
- Data collection methods and security
- Database entry system(s)
- Data analysis plans
- Distribution of project performance:
 - To internal stakeholders
 - To external stakeholders
- Narrative progress reports
- Dissemination of reports and evaluations
 - To supervisor
 - To stakeholders or others as described in proposal

Grant Project Status

- | | | |
|--|------------------------------|-----------------------------|
| Is recordkeeping satisfactory according to GRCC practices? | <input type="checkbox"/> Yes | <input type="checkbox"/> No |
| Are activities on schedule according to the grant agreement/contract? | <input type="checkbox"/> Yes | <input type="checkbox"/> No |
| Are all procedures relating to grant management being followed and documented?
(See GRCC Grants Policy and Grant Management Guide). | <input type="checkbox"/> Yes | <input type="checkbox"/> No |
| Have grant requirements been complied with (evaluation, reporting, etc.)? | <input type="checkbox"/> Yes | <input type="checkbox"/> No |
| Is the project fully staffed as outlined in the proposal? | <input type="checkbox"/> Yes | <input type="checkbox"/> No |
| Are data collection, storage, and retrieval systems in place to support reporting? | <input type="checkbox"/> Yes | <input type="checkbox"/> No |
| Are activities on schedule according to the grant agreement/contract? | <input type="checkbox"/> Yes | <input type="checkbox"/> No |
| Are the performance objectives being met? | <input type="checkbox"/> Yes | <input type="checkbox"/> No |
| Were any unique or special activities or accomplishments identified? | <input type="checkbox"/> Yes | <input type="checkbox"/> No |
| If yes, please describe. | | |

Summary of the Visit

- | | | |
|--|------------------------------|-----------------------------|
| Is technical assistance needed? If yes, explain. | <input type="checkbox"/> Yes | <input type="checkbox"/> No |
| Are corrective actions recommended? If yes, explain. | <input type="checkbox"/> Yes | <input type="checkbox"/> No |

Comments and main points addressed during the review.

Signatures

Reviewer:	Date:
Project director:	Date:
Supervising administrator:	Date:

Pre-Closeout (6 months prior to close-out)

If you do not anticipate that the project will be completed on time, determine if no-cost extensions are allowed. Contact the Grants Department and Grant Accounting Specialist for technical assistance if a no-cost extension is to be requested.

Contact the Grant Accounting Specialist to review all encumbrances and projected final expenditures.

Note: Please keep in mind that all supplies necessary for project completion should be purchased at least 60 days prior to the project end date. All supplies must be used by the end date. **Do not** make unusual expenditures at the end of a grant project.

Make note of the due dates for final performance and financial reports.

Budget

60 days prior to closeout, clear out all open encumbrances from your budget. Inform the Grant Accounting Specialist of any pending items.

60 days prior to closeout, ensure all subrecipient invoices been paid. Review the status of outstanding invoices, final invoices, and confirm payments with the Grant Accounting Specialist.

60 days prior to closeout, confirm that all interim and final invoices and deliverables from subcontractors and/or consultants have been collected and processed.

30 days prior to closeout, reconcile line items and process adjustments with the Grant Accounting Specialist.

30 days prior to closeout, ensure all institutional cost share/leverage (e.g., cash, in-kind, personnel, space) documentation is submitted to the Grant Accounting Specialist. Make sure all paperwork is complete with signatures and is properly supported (e.g., copy of purchase orders, invoices, etc.) as required by the grant.

30 days prior to closeout, ensure all Time and Effort Certification Forms been completed and certified, and that staff has been paid.

Purchasing Activities

60 days prior to closeout, finalize all equipment purchases (i.e., received and installed). Make plans for the final purchase of supplies and services.

60 days prior to closeout, follow-up on open purchase requisitions/purchase orders to ensure timely receipt of goods and services and/or timely receipt of invoices from vendors.

Note: Purchase of supplies or equipment can be disallowed by auditors if they occur too late in the project to be legitimately needed.

30 days prior to closeout, ensure that all grant equipment and supplies are accounted for and on campus.

Personnel

90 days prior to closeout, notify Human Resources of the end date for grant-funded positions.

Grant Files

- Ensure that all grant project files are up-to-date. This includes copies of grant documents such as grant award notifications and other communications from the funding agency, the original proposal, meeting records, personnel records, evaluation records, project data, and budget records to include purchase orders, purchase requisitions, and invoices.
- Prepare for all records/documents to be properly maintained and stored. You are required to maintain all official records and supporting documentation pertaining to your grant for a period of three years.

Final Reporting

- Has the project evaluation has been completed?
 - If completed by an external evaluator, provide a copy of the report to the Grants Department.
- Have you prepared all required programmatic and data reports?

Appendix B: Tips for Successful Grants Management

Helpful Hints for Grants Management

1. **During the start-up phase of your grant project:**
 - Enter all dates into your GroupWise calendar according to the project timeline.
 - Schedule an initial meeting with the Grants Department and the Grant accounting specialist.
 2. **Ask enough questions.** As a new project lead the sheer volume of information can be daunting. Proper management of the grant project is important. This handbook provides the basics, but the Grants Department is here to assist you.
 3. **Set aside time at regular intervals to manage your grant.** Depending on the size and complexity of the grant, this may require one or more hours per week.
 4. **Read your mail and follow-up meetings with an email or memo.** Academic communities communicate in writing. Paper and email trails protect the grant, the college, and grant administrators from misunderstood communications. Copy your supervisor and the Grants Department on emails and keep hard copies of all documents and correspondence in your grant project file.
 5. **Credit the sponsor.** On any piece of printed material, whether a press release, brochure, or major product, a credit line should appear, listing the grantmaking agency by its full name. If oral presentations are given to community groups or at conferences, the grantmaking agency should be credited. Work with the Grants Department to ensure that specific grantmaking agency guidelines regarding such communications are being followed.
 6. **Provide lead time.** The grant project is one of many impacting GRCC services. People work best when adequate lead time is provided. Grants frequently deviate from routine college activities, thus, more lead time is often needed to make special arrangements for grant activities. Be considerate and plan ahead.
 7. **Don't lobby, don't politic, and don't support religious activities.** All of these interesting activities are strictly prohibited with grant funds. This includes using staff time for any of these activities. Support letters for legislation cannot come from project staff. If in doubt, contact the Grants Department.
 8. **Do not purchase from relatives or friends.** Be sure to complete the [supplier application](#) that is available online on the Purchasing Department [webpage](#).
 9. **Keep the Grants Department informed and address problems before they become a crisis.** Any grant project has the potential for going awry. Contact your supervisor and/or the Grants Department if things begin to get off track to find early solutions.
- AND PERHAPS MOST IMPORTANT...**
10. **Keep up with the budget.** Grant funds represent the end result of a highly competitive process with other institutions. They are an investment by the public or private entity in GRCC's future. The college will be held accountable for its stewardship of those funds.
 11. **Meet all reporting deadlines.** Grant reports must always be filed by the due date—no later! Mark all due dates ahead of time on a yearly calendar and remember that your reports must be submitted to the Grants Department for review or submission *at least five (5) days* prior to the deadline. Complete all reports as if you plan to apply for funding again.

Appendix C: Definitions

Allowable Cost

A cost for which an institution or agency may be reimbursed under a grant or contract with a governmental agency. These are determined by the Federal Office of Management and Budget (OMB), the funding agency's requirements, and/or GRCC policy and administrative regulations.

Amendment

Modification of an existing contract, sub-contract, budget, etc.

Authorized Organization Representative (AOR)

A member of an organization who is approved by the EBiz POC to submit grant applications in Grants.gov on behalf of the organization. Only an AOR has the authority to sign and submit Federal grant applications.

Conflict of Interest

In procurement, this refers to using a vendor that is a member of your family or a personal friend. It can also refer to *involvement* in hiring a family member. Conflict of interest can also occur between a funding source and a financial investment asset, or any other relationship with the potential to impact the results of the research or project. Please review GRCC's [conflict of interest policy](#).

Continuation Grant

An extension or renewal of existing program funding for one or more additional budget period(s) that would otherwise expire. Continuation grants are typically available to existing recipients of discretionary, multi-year projects; however, new applicants may be considered.

Contract

A legal instrument by which an entity procures goods and services from another party to carry out a project or program. A contract creates a procurement relationship with the contractor.

Contractor

An entity that receives a contract, and:

1. Provides the goods and services under a procurement relationship within normal business operations;
2. Provides similar goods or services to many different purchasers;
3. Normally operates in a competitive environment;
4. Provides goods or services that are ancillary to the operation of the Federal grant program; and
5. Is not subject to compliance requirements of the Federal program as a result of the agreement, though similar requirements may apply for other reasons.

Grant Recipient

A non-Federal entity that receives a Federal award directly from a Federal awarding agency to carry out an activity under a Federal program.

Pass-Through Entity

A non-Federal entity (grant recipient) that provides a Federal award to a sub-recipient to carry out a Federal program.

Sub-award

An award provided by a pass-through entity to a sub-recipient for the purpose of carrying out a portion of a Federal award.

1. A sub-award creates a Federal assistance relationship with the sub-recipient, with additional Federal compliance mandates.
2. A sub-award does not include payments to a contractor or payments to an individual that is a beneficiary of a Federal grant program.
3. A sub-award may be provided through any form of legal agreement, including an agreement that the pass-through entity considers a contract.

Sub-recipient

A non-Federal entity that expends Federal awards received from a pass-through entity to carry out a Federal program.

1. Determines who is eligible to receive what Federal assistance;
2. Has its performance measured in relation to whether objectives of a Federal program were met;
3. Has responsibility for programmatic decision-making;
4. Is responsible for adherence to applicable Federal program requirements specified in the Federal award;
5. In accordance with its agreement, uses the Federal funds to carry out a program for a public purpose specified in authorizing statute, as opposed to providing goods or services (as a contractor) for the benefit of the pass-through entity; and
6. Grant recipients are required to monitor the activities of sub-recipients as necessary to ensure that Federal awards are used for authorized purposes in compliance with laws, regulations, and the provisions of contracts or grant agreements and that performance goals are achieved.

Cost Sharing

The portion of allowable project costs not paid by Federal funds (unless otherwise authorized by Federal statute). If the award is Federal, only acceptable non-Federal costs qualify as cost sharing. Cost sharing may include costs incurred by the college or an outside source such as:

1. The services of an employee (personnel effort without salary recovery) that are valued at the employee's regular rate of pay plus fringe benefits that is reasonable, necessary, allocable, and otherwise allowable.
2. Cash contributions.
3. Volunteer services furnished by professional and technical personnel, consultants, and other skilled and unskilled labor.
4. Donated property, supplies, equipment.

Direct Cost Sharing

Those costs that can be identified specifically with a particular final cost objective, such as a Federal grant award, or that can be directly assigned to such activities relatively easily with a high degree of accuracy. Typical costs charged directly to a Federal award are:

1. The compensation of employees who work on that award and their related fringe benefit costs that are valued at the employee's regular rate of pay and that is reasonable, necessary, allocable, and otherwise allowable.
2. The costs of materials, travel, equipment and other items of expense incurred for the Federal award.
3. The salaries of administrative and clerical staff should normally be treated as *indirect costs*. Direct charging of these costs may be appropriate only if all of the following conditions are met:
4. Administrative or clerical services are integral to a project or activity;
5. Individuals involved can be specifically identified with the project or activity;
6. Such costs are explicitly included in the budget or have the prior written approval of the Federal awarding agency; and
7. The costs are not also recovered as indirect costs.

Indirect Cost Sharing

Those costs that are incurred for common or joint objectives and therefore cannot be identified readily and specifically with a particular grant project, an instructional activity, or any other institutional activity. For major institutions of higher education, indirect (F&A) costs must be classified within two broad categories:

1. **Facilities:** Depreciation on buildings, equipment and capital improvement, interest on debt associated with certain buildings, equipment and capital improvements, and operations and maintenance expenses.
2. **Administration:** General administration and general expenses such as the director's office, accounting, personnel and all other types of expenditures not listed specifically under one of the subcategories of "Facilities" (including cross allocations from other pools, where applicable).

Mandatory Cost Sharing

Cost sharing that is required by the grantmaking agency in its general guidelines or in a specific program announcement.

Voluntary Cost Sharing

Cost sharing that is not required by the grantmaking agency but is offered voluntarily by the college and quantified in the project budget. If included in the grant proposal's budget or the Federal grant award, those financial commitments become a binding requirement of the Federal award and costs must be monitored for compliance. Generally, the college does not approve voluntary cost sharing.

Committed Cost Sharing

A contribution of effort or other costs that are quantified in the proposal narrative, budget, budget justification, or in the award document. Committed cost sharing may be either mandatory or voluntary. If included in the grant proposal's budget or the Federal grant award, those financial commitments become a binding requirement of the Federal award and costs must be monitored for compliance.

Equipment

Tangible personal property (including information technology systems) having a useful life of more than one year and a per-unit acquisition cost which equals or exceeds the lesser of the capitalization level established by the non-Federal entity for financial statement purposes, or \$5,000.

Federal Awarding Agency

The Federal agency that provides a Federal award directly to a non-Federal entity.

In-kind Contributions

A non-cash contribution of the fair market value of goods or services provided by the college or non-Federal third parties to a grant project when such contributions directly benefit that project and are generally counted as cost sharing. Examples include the fair market value of project supplies, transportation, and services.

Letter of Commitment

A letter of commitment shows that an organization believes a project is so worthwhile that it is willing to commit personnel or resources to it. Letters of commitment from partners and collaborators demonstrate that the funding agency is not the only source of financial support for a project. Some examples of commitment include (but are not limited to):

- Staff time devoted to a project;
- Donation of supplies, equipment, or other goods;
- Use of facilities or services (such as office space); or
- Cash donations.

Letters of commitment should be obtained from project partners and collaborators only after data generation, discussion about the merits of the proposal, and development of a work plan and timeline. Because commitment implies financial support in one form or another, partners must be fully informed of project expectations, and the extent of their commitment must be fully outlined.

Letter of Support

A letter of support states that an interested party believes that a project is worthwhile. Letters of support may be solicited from community organizations, businesses, other academic institutions, or other stakeholders. A letter of support does not commit any financial or in-kind support. Rather, a letter of support merely indicates to funding agencies that GRCC has established connections with businesses and people who are familiar with our mission, share our values, and are interested in the success of our proposal.

Matching Funds

Funding required by the funding agency, to be raised from non-Federal outside sources, to increase the level of support provided by the funding agency. Such funds must be identified by the donor or funding source for use as matching funds.

Memorandum of Understanding (MOU)

A written commitment by two or more parties to allocate time and/or resources toward a mutual goal (as defined in GRCC Policy, Section 3.0 College Operations, §3.7 Contracting Authority).

Non-Federal Entity

A state, local government, Indian tribe, institution of higher education (IHE), or nonprofit organization that carries out a Federal award as a recipient or subrecipient.

Pass-through Entity

A non-Federal entity that provides a sub-award to a subrecipient to carry out part of a Federal program.

Project Period

The period established in the award document during which awarding agency sponsorship begins and ends.

Real Property

Land, including land improvements, structures and appurtenances thereto, but excludes moveable machinery and equipment.

Third-Party In-Kind Contribution

The value of non-cash contributions (i.e., property or services) that:

1. Benefit a Federally assisted project or program; and
2. Are contributed by non-Federal third parties, without charge, to a non-Federal entity under a Federal award.

Direct Cost Allowability Matrix

Selected Cost Item	Uniform Guidance General Reference	Require Prior Approval	Allowable?	Conditions for Allowability
Advertising and public relations costs	\$200.421		Maybe, with restrictions	Allowable if for recruitment of personnel required for performance of the award, procurement of goods and services for the performance of the award, or for program outreach and other specific purposes necessary to meet the requirements of the award.
Advisory councils	\$200.422		Maybe, with restrictions	
Alcoholic beverages	\$200.423		No	
Alumni/ae activities	\$200.424		No	
Audit services	\$200.425		Maybe, with restrictions	See 2 CFR 200.425
Bad debts	\$200.426		No	
Bonding costs	\$200.427		Maybe, with restrictions	
Collection of improper payments	\$200.428		Yes	
Commencement and convocation costs	\$200.429		No, with exceptions	
Compensation for personal services	\$200.430	Yes (related to the salaries of administrative and clerical staff)	Maybe, with restrictions; Special conditions apply (e.g., \$200.430(h))	
Compensation – fringe benefits	\$200.431	Yes (related to costs for IHEs)	Yes, with restrictions; Special conditions apply	
Conferences	\$200.432		Maybe, with restrictions	See 2 CFR 200.432 and terms of award
Contingency provisions	\$200.433		No, with exceptions	May be allowable with prior sponsor written approval (i.e., for large construction or similar type projects). See 2 CFR 200.433
Contributions and donations	\$200.434		No (made by non-Federal entity); not reimbursable but value may be used as cost sharing or matching (made to non-Federal entity)	
Defense and prosecution of criminal and civil proceedings, claims, appeals and patent infringements	\$200.435		Maybe, with restrictions	
Depreciation	\$200.436		Maybe, with qualifications	
Employee health and welfare costs	\$200.437		Maybe, with restrictions	
Entertainment costs	\$200.438	Yes	No, with exceptions	In extremely rare cases when specific costs have a programmatic purpose and are authorized either in the approved budget or with prior sponsor written approval
Equipment and other capital expenditures	\$200.439	Yes	Allowability based on specific requirements	
Exchange rates	\$200.440	Yes	Maybe, with restrictions	See 2 CFR 200.440. Allowable if additional funds will not be needed from the sponsor.
Fines, penalties, damages and other settlements	\$200.441	Yes	No, with exceptions	
Fundraising and investment management	\$200.442	Yes	No, with exceptions	
Gains and losses on disposition of depreciable assets	\$200.443		Maybe, with restrictions	

Selected Cost Item	Uniform Guidance General Reference	Require Prior Approval	Allowable?	Conditions for Allowability
General costs of government	\$200.444		No	
Goods or services for personal use	\$200.445	Yes	No	
Idle facilities and idle capacity	\$200.446		Maybe	Idle facilities - unallowable with exceptions; idle capacity - allowable with restrictions
Insurance and indemnification	\$200.447	Yes	Maybe, with restrictions	
Intellectual property	\$200.448		Maybe, with restrictions	
Interest	\$200.449		Maybe, with restrictions	
Lobbying	\$200.450		No; Special additional restrictions	
Losses on other awards or contracts	\$200.451		No	However, they are required to be included in the indirect cost rate base for allocation of indirect costs.
Maintenance and repair costs	\$200.452		Maybe, with restrictions	
Materials and supplies costs, including computing devices	\$200.453		Maybe, with restrictions	
Memberships, subscriptions, and professional activity costs	\$200.454	Yes	Maybe, with restrictions	Unallowable for lobbying organizations
Organization costs	\$200.455	Yes	No, except with Federal prior approval	
Participant support costs	\$200.456	Yes	Maybe, with prior approval of the Federal awarding agency	Participant support costs means direct costs for items such as stipends or subsistence allowances, travel allowances, and registration fees paid to or on behalf of participants or trainees (but not employees) in connection with conferences or training
Plant and security costs	\$200.457		Yes; capital expenditures are subject to §200.439	
Professional service costs	\$200.459		Maybe, with restrictions	
Proposal costs	\$200.460		Maybe, with restrictions	See 2 CFR 200.460
Publication and printing costs	\$200.461		Maybe, with restrictions	If the photocopies or printing costs are directly related to the programmatic objectives and can be tracked and documented, they may be included in the proposal budget.
Rearrangement and reconversion costs	\$200.462	Yes	Maybe	
Recruiting costs	\$200.463		Maybe, with restrictions	
Relocation costs of employees	\$200.464		Maybe, with restrictions	
Rental costs of real property and equipment	\$200.465		Maybe, with restrictions	Real property means land, including land improvements, structures and appurtenances thereto, but excludes moveable machinery and equipment.
Scholarships and student aid costs	\$200.466		Maybe, with restrictions	
Selling and marketing costs	\$200.467	Yes	No, with occasional exceptions	
Specialized service facilities	\$200.468		Maybe, with restrictions	
Student activity costs	\$200.469		Maybe	No, unless specifically provided for in the Federal award
Taxes (including Value Added Tax)	\$200.470		Maybe, with restrictions	See 2 CFR 200.470
Termination costs	\$200.471		Maybe, with restrictions	See 2 CFR 200.471 for what termination costs might be allowable
Training and education costs	\$200.472		Yes, for employee development	
Transportation costs	\$200.473		Yes	
Travel costs	\$200.474	Yes	Yes, with restrictions	Travel costs are allowable if: 1. Travel of the individual is necessary and provides a direct benefit to the sponsored project as justified by documentation. 2. Travel costs are reasonable and consistent with the College's travel policy.
Trustees	\$200.475		Yes, with restrictions	