Project Director (Post-award) Handbook

Office of Grant Development and Management

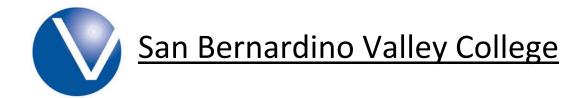


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Congratulations, you're a project director! This is an exciting opportunity. You've won funding for a project, and now it's your chance to realize the vision of your project.

The role of project director comes with some significant responsibilities. The guidelines in this handbook will assist with minimizing any difficulties that may arise as you embark on what is now a legally binding contract.

The Project Director Handbook is here to help you along the way and to help make sure you avoid some serious pitfalls. Undoubtedly, you'll encounter some incredible successes and some unforeseen challenges along your project's journey. But we're here to help, and so is this guide! Feel free to contact the Director of the Grants Office with any questions or concerns.

Please note: Once you have read the handbook, print out and sign the Project Director Agreement form included in the Appendix. Personnel assigned to work on grant-related activities should sign the Personnel Grant Agreement form also included in the Appendix. The forms should be turned into the Director of the Office of Grant Development and Management.

Important Grants Contacts

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ROLE OF THE GRANTS OFFICE

The Grants Office (aka the Office of Grant Development and Management) is the formal point of contact with funding agencies. All communications with funding agencies, including budget modifications and program reports, must be initiated or approved by the Grants Office.

The Grants Offices acts as a bridge between the pre-award and post-award process. The Grants Office Director works with the Project Director to determine if a grant is a good fit and to prepare solicitation documents. Once a grant has been awarded, the Grants Office Director then works with the Project Director to ensure compliance, review and monitor budgets, and meet technical assistance needs. The Grants Office Director approves major changes regarding grant, contract, and budget modifications. The Grants Accountant sets up fiscal reports, maintains accounting records, processes transactions and provides information to auditors.

The Grants Office coordinates all post-award financial services. The office also reviews proposal budgets for accuracy and compliance and maintains account budgets to ensure expenditures meet granting agency requirements and project needs. Purchase orders and vendor payments are conducted through the Grants Office. All travel advances and reimbursements that are related to grant projects are also handled by the office, which coordinates any necessary pre-approvals. Any process adjustments or continuations, as well as grant closings and final reporting, are also conducted though the office.

The Grants Offices maintains the following files:

Agency correspondence	Agency-approved negotiated budgets
Amended proposals as negotiated	Audit files/Financial contributions
Award letters/Signed contracts	Budgets established for college use
Budgets submitted to granting agencies	Final and interim project reports
Original proposal documents	Purchase Requests/Orders
Reader's/Reviewer's comments	Application forms
Copies of grant subcontracts	Other project-specific documentation

PROJECT DIRECTOR'S ROLE AND RESPONSIBILITIES

Once a grant has been awarded and approved by the board of trustees, it is a legally binding document. Take the time to carefully familiarize yourself with the guidelines and requirements of the grant proposal and those of the applicable funding agency. Depending on the type of agency that has made the award, a variety of federal, state, local, and institutional policies and procedures may apply.

When an award is announced, the Director of the Grants Office will set up a meeting with the Project Director and will go over the original grant proposal and requirements, including allowable costs for approved budget categories. It is critical that the Project Director not deviate from allowable costs as any misuse of funds can result in a federal audit, a termination of funding, and could prevent the college from being eligible for future grants for up to 10 years.

Following that meeting, the Project Director will set up subsequent monthly meetings with the Grants Director to discuss project progress and unforeseen challenges. New Project Directors will schedule a monthly meeting with the Grants Director during at least the first six months of the project.

A meeting for all SBVC Project Directors will be held each semester. These meetings provide an opportunity for Project Directors to network and ask questions of others who may have experienced similar challenges or obstacles.

The Project Director will keep a log or journal of activities, periodic reflections, musings, and analysis of how the grant is doing in terms of meeting objectives. The journal will prove an invaluable resource when it comes time to compile interim and final reports and will actually be a time saver for these tasks. The journal also will help keep the big picture in focus. It will encourage depth of thought about what the project's ultimate purpose is and how the college will carry on the work beyond the life of the grant.

Consider addressing the following questions in the journal: Do we see how this project is changing anything? Is there a discernible impact? Are the outcomes expected or are we seeing something different from what we expected? Are

project outcomes being achieved? Besides money, what will it take to sustain key elements of the project? In order to sustain these elements, do we need changes in attitude, procedures, and policies or other factors? And finally, how does the grant project relate to the ultimate strategic goals of the college and district? It is important for the Project Director to have an understanding of the grant as it relates to the strategic direction and priorities of the college and district, because the project will be integrated into the college as activities take place, and at the termination of funding, and needs to relate strongly to college goals.

Reporting requirements vary among funding agencies. Some agencies may only require annual reports. Others may require interim reports or monthly financial reports. It is critical that you read the reporting requirements. Interim and final reports are must be turned into the Grants Office five (5) working days before they are due. This allows time to gather internal approvals and signatures.

<u>Additional Project Director Responsibilities Include:</u>

Leadership

- —Oversee the overall management of the administrative and technical aspects of the grant agreement
- Keep the project on track, including adhering to the project timeline and the implementation of activities without any delays
- —Monitor budget expenditures: Track grant and match funds that have been used, in conformance with applicable laws, rules, and regulations
- Know your contractual obligations and adhere to the terms of the grant agreement

Documentation

- —Maintain a calendar of significant deadlines for the grant
- —Submit deliverables in a timely manner
- Maintain time-and-effort reports
- —Prepare an annual self-evaluation to be provided to the Grants Director

Communication

- —Facilitate communication among all stakeholders and notify the Grants Director of any delays or other issues that may arise.
- —Prepare and submit to the Grants Director all required quarterly/monthly progress reports
- —Document time spent on project, including monthly time and effort reports and office hour card (see appendix)

Meetings

- —Organize and hold regular staff meetings with those involved in the grant, including those paid by the grant and those performing project activities; send a notice to the Grants Director who will also try to attend
- —Attend regular meetings with the Grants Director and Grants Accountant; an additional meeting must be held two (2) weeks before the due date of all interim and final project reports

COMMUNICATIONS WITH THE GRANTING AGENCY

The Project Director will receive paperwork from the program officer at the granting agency. The first, and most important, document you will receive will be a Grant Award Notification. The notice will contain a grant/contract number, project start and end date, and amount awarded. Other information may include limitations imposed on the grant contract, reporting requirements, and contact info for the agency's Program Officer. Often a copy will be sent to the Grants Office, but not always. Please make sure to communicate with the Grants Director to ensure that the Grants Office has received the Grant Award Notification and all subsequent paperwork. All original documents must be kept on file in the Grants Office. Scan the paperwork and make electronic copies to keep in e-folders.

Please note that the Grants Director, who is technically the grant supervisor, needs to sign all official government forms and purchase requests related to grant activities. Similarly, department requests must go through the grants office. Deans and Vice Presidents do not need to sign department requests that pertain to grant projects, but Department Chairs and Deans should be informed and aware of any impacts to faculty load or time away, such as for conferences. The Grants Office signs purchase and travel requests, which are sent on to the President's Office and then the purchasing office. Budget inquiries should be

directed to the Grants Director and Grants Accountant. Submit your purchase requests for pre-approval (see form in appendix) to both the Grants Director and Grants Accountant. No grant funds can be spent or contracted for until the Board of Trustees has approved the award.

The project director should establish a working relationship with the Program Officer assigned to your project. New project directors should discuss potential questions internally prior to contacting the program officer. Styles vary among program officers; some are very hands-on and like to answer questions and offer guidance and support. Others prefer to be contacted as little as possible. You should attend a project conference during your first year if possible, to meet your program officer and assess his or her accessibility and working style. You may also have a chance to submit a written request in your annual report (APR) and should receive a response from your program officer shortly thereafter, either approving the request, asking for more information, or denying the request.

When your program officer affirms a request you have made, if you have made that request in person or over the phone, make sure to confirm approval by following up with a written email documenting the conversation you had with the program officer, and asking for him or her to confirm approval through a reply. Program officers change during the course of a project, and there is enough variation in policy for one program officer to approve a given request while the next one may be inclined to deny it. Protect yourself and the project by documenting any discussions, approvals, or rejections of requests. These, along with the original grant, become the documents ruling what can and can't be done with grant funds awarded for your particular project.

PROJECT REPORTS

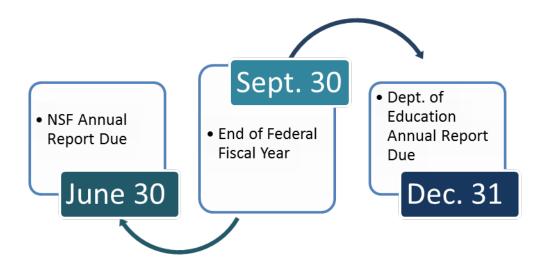
Typically, regularly scheduled reports (such as monthly or quarterly reports) as well as annual or final project reports are required by a granting agency. The Project Director will prepare all reports. Please note that the quality of the reports and your ability to meet the report deadlines can have a direct impact on the college's chances for future funding.

Different granting agencies have different reporting requirements. For example, the National Science Foundation requires quarterly financial reports and annual program reports; the latter are due BEFORE (90 days) the end of the project year rather than after. Many agencies require interim and annual reports. Before writing a report, check the requirements of the agency that has awarded the grant.

Progress reports usually include a brief description of the work performed thus far, accomplishments and milestones achieved during the reporting period, results monitoring, and problems encountered in the performance of the work under the agreement. The narrative portion of the report should contain sufficient information to verify the level of work completed during the reporting period. Data on progress toward meeting project objectives is usually required; plan for this and communicate with the Office of Research, Planning, and Institutional Effectiveness and create a data request for what you need for the report; generally, data on progress toward meeting outcomes for each objective are required. The budget summary needs to reflect expenditures during the project year; coordinate this with the Grants Accountant, who will help you track expenditures, and will also help with fiscal year issues (the grant's year may not be the same as the college's).

Deadlines for grants also vary depending on the granting agency. During the first year of a federal grant, such as a Department of Education grant, an interim report is due six (6) months after the grant start date. An annual report is due 90 days after the end of the fiscal year. Since the federal government's fiscal year ends Sept. 30, the report is due generally Dec. 31. In recent years, the Department of Education has issued a range of closing dates for the report, from December to March; note which dates are relevant for your project. By contrast, the National Science Foundation requires that annual reports be submitted 90

days before the end of the government's fiscal year; if a project from each agency starts October 1, the schedule of reports is due as shown in the following figure.



As a deadline nears, a program officer will usually send an email to the Project Director with information about the requirements and mandatory forms. At that time, the Project Director will schedule a meeting with the Grants Director and will bring all paperwork to the meeting. The Grants Director and the Grants Accountant will assist with preparing the paperwork and will ensure the budget is aligned with the reporting requirements.

Interim federal reports are typically submitted by email while annual federal reports are submitted electronically. The Grants Director will review all reports prepared by the Project Director in order to certify that the reports accurately reflect work performed on the grant. When it comes time to submit a final report, the Project Director and Grants Director will log in together and complete the submission together.

DATA GATHERING

The Project Director will coordinate data collection and recording activities with the Dean of the Research Office. Data Collection is a shared responsibility between the Project Director and the Office of Research. See the section on project reports (above) for instructions on submitting a data request for a quarterly or annual report. When the project has an outside evaluator, the Office of Research has access to internal data to which the project evaluator may need access. The Office of Research must ensure that any data distributed to the project evaluator does not violate the Federal Education Rights and Privacy Act (FERPA).

Evaluators and Your Project's Evaluation

The evaluator for a project will be selected by the Project Director in consultation with the Grants Office, which will prepare the contract for the project evaluation. The recommended time to have an evaluator start working is three (3) months before the first project report is due. An additional allowance of two (2) months must be made for the contract and board of trustees' approval process. Therefore, five (5) months total are needed to start the process of hiring the project evaluator. For Department of Education grants it is recommended that the process begin within the first one (1) or two (2) months of the project. Hiring of other personnel involved in the grants follows a similar process. Hiring full-time personnel is time consuming and must follow the district's hiring process for employees. Personnel hired through the grant must be approved by the Board of Trustees and the budget for those employees must be submitted as an action item on the board's agenda.

Sample Timeline for Hiring an Evaluator



The Project Director will coordinate a meeting with the evaluator, Grants Director, and Dean of the Research Office at the very beginning of the grant to discuss what data will be needed and to give the Office of Research advance notice of what data categories will be needed for data mining for project reports. This will ensure that data collection begins and continues throughout the life of the grant. This meeting is also important because it will enable the Office of Research and the evaluator to define data parameters and to determine whether any surveys are needed. Surveys must to be designed in concert with the Office of Research.

SUBAWARDS

If another educational institution is a partner on your grant and will be receiving explicitly budgeted funds through the grant, this is considered a subaward. Our frequent partners are Cal State, San Bernardino and UC Riverside. Recipients of subawards manage their funds at their sites. However, the SBCCD Board of Trustees must approve the initial award. A contract must then be prepared and given to the project partner for review. The contract will be prepared by the Grants Office, not the Project Director. After review by the partner institution, the contract will be submitted to the SBCCD board of trustees. From start to finish, the entire process takes about four (4) months.

Sample Timeline



Please note that subawardees submit invoices to SBVC quarterly for funds to conduct activities. The money is disbursed by the SBCCD business office. The Project Director does not oversee the drawdown of funds.

MEETINGS, CONFERENCES, AND FOOD

Granting agencies typically have strict guidelines about what costs are allowed for meetings and conferences. The Grants Office is often asked whether it is ok to pay for food and beverages out of grant monies. Our answer is usually, "It depends." That's because this is tricky territory, and it is easy to overstep and violate funding regulations.

To clarify some of the issues, here is a short summary of what the Dept. of Education allows. Hosting a meeting or conference is permitted for purposes directly related to the operation of the grant, such as to convey information related to grant objectives. However, webinars or video conferences should be considered as an alternative since they may be more cost and time effective than hosting a face-to-face gathering.

The Department of Education discourages and typically does not consider the purchase of food and beverages necessary toward achieving a grant's goals and objectives. Events can be structured so that participants have time to purchase food and beverages on their own or you can offer an option, such as boxed lunches, that participants can buy at the event. However, if you have a situation you believe warrants a food expenditure, notify the Grants Office, which will direct you as to the likelihood for approval. If it seems to be a request that is necessary to carry out the project, the Grants Office will direct you to contact your program officer to obtain approval. As noted earlier, obtain any approvals in writing so if there is any question or an audit later, there is documentation.

The purchase of refreshments with grant funding is not justifiable "in virtually all cases," according to the Department of Education. If another source of funding is used to pay for refreshments at an event, the agenda must note that Federal grant funds were not used to pay for food or beverages.

If you are traveling to a meeting or conference as part of a grant, allowable expenses include transportation, per diem, and lodging as long as the costs are necessary and reasonable. For example, taking public transportation, a taxi, or a shuttle van to get from the airport to your hotel is considered a reasonable expense; hiring a limousine service is not.

Before leaving for a trip, a travel request/claim form (SD-1) needs to be filled out as it will be used to create a purchase request. Obtain signatures as required for your area; protocols may differ depending on the department for which you work. Usually, either the Director of Grants or your division Dean signs; then the President. The signed form is sent to the board of trustees for approval. After a Project Director has returned from a conference, a travel report (AC-10) form must be filled out. The costs on the AC-10 form cannot exceed 10% of the initial travel request amount. Expenses other than registration, hotel, and airfare are submitted through Concur. A sample form (for travel) and a sample AC-10 form (for conferences) are included in the Appendix.

The Department of Education has issued a Frequently Asked Questions document for project directors on allowable costs, and it is included in the Appendix.

HOW TO MANAGE YOUR BUDGET

The Grants Office handles the continuation of funds and the carryover of funds for multi-year awards. The Project Director will be notified by the funding agency if an award has been continued. The funding agency does not always notify the Grants Office about award continuations, so it is important to let the Grants Office know if you receive any communication about this. Sometimes when an award is continued, the budget is reduced from what was originally approved; for federal grants, this will be noted in your GAN (Grant Award Notification) form received each year. If a funded amount is different from what was originally proposed, the Grants Office and the Project Director will need to make a decision about what to cut back.

It is important to note that while two colleges may receive the same kind of grant, they may do very different things with the money. This is because project objectives must align with the college's and district's strategic plans. It is not a good idea to compare projects across colleges. Just because one college is doing something, does not mean we should be doing the same thing with our grant funding.

If two grants with similar objectives are being carried out simultaneously at the college, it is important to document all expenses to ensure that the co-mingling of funds does not occur. Money from one grant cannot be used to pay for activities

of another grant. This also applies to activities related to data tracking for research and reporting purposes.

Supplanting internal funds with external funds is ILLEGAL. Supplanting occurs when grant funds are used to pay for activities that have been budgeted elsewhere, or for personnel time that is affiliated with a particular project but paid for with another. If you have any questions about whether a situation might be considered supplanting, immediately consult with the Grants Director.

Always check with the Grants Accountant if you have any doubts about a purchase. A number of seemingly straightforward purchases have changed to contracts by the district. These include web services and subscriptions. If an object code begins with a numeral "5," it probably requires a contract. Do not make purchases on your own or establish open purchase orders; these are hard to track and document. Fill out the Purchase Requisition Approval Form included in the Appendix and turn it in to the Grants Office.

TIME, EFFORT, AND BUDGETARY RESPONSIBILITIES

The Project Director is responsible for ensuring that the expenditure of public funds is made in accordance with state and federal rules and regulations.

Staff members, including Project Directors, who are paid in part by grant funds need to fill out and submit monthly Time-and-Effort Reports. A sample Time-and-Effort report is included in the Appendix. Also, fill our an office time card showing the time you are in class, in the office, or working on a grant project; change this card as often as your schedule changes: weekly, monthly, or by term.

The time-and-effort forms require the name of the employee working on the grant, social security number, title, the name of the grant, the amount of time devoted to the grant, activities conducted in specific timeframe, and major responsibilities. The Grants Accountant will ensure the correct percentage of funds are allocated from the budgets assigned to each person. For instance, if your Title V grant requires a pay-down in personnel time over the course of the project, where larger percentages are paid by the college's general fund as the grant progresses, the Grants Accountant will confirm these amounts and

communicate with the Project Director to ensure activities and time are being allocated as promised to the granting agency.

External controls, set up by the college and district, regulate how grant expenditures are documented and approved. People at various levels with the necessary expertise and approval authority are involved in different stages of the process in handling funds. This is an important check and balance to ensure that expenditures are in line with grant activities. It also prevents a single person from being able to request a purchase as well as approve a purchase.

For costs to be reimbursable, they must be directly related to the project. Refer to the grant proposal budget narrative and budget summary to determine what costs have been approved.

The Project Director will work with the Grants Office to:

- Establish and maintain financial management controls and accounting procedures to track grant and match funds that have been used, in compliance with applicable laws, rules, and regulations.
- Provide adequate documentation to support the expenditure of funds in accordance with the provisions, program objectives, and applicable laws, rules, and regulations.
- Maintain auditable records that document the amounts and use of all grant and match funds for the entire term of the project.

HOW TO SUBMIT A PURCHASE REQUEST

Federal and state grants have strict cost principles that a Project Director needs to follow. Purchasing anything that has to do with advertising is strictly prohibited. Costs outlined in the approved grant proposal must fall within the college's approved categories before items can be ordered.

A purchase request (PR) form, to be used internally, is included in the Appendix. A PR must be submitted before each grant expenditure. The form asks the Project Director to describe the nature of the proposed expense and to describe how the purchase fulfills a grant objective. The PR serves two purposes. First, it is a check

and balance to make sure that all expenditures are in line with the approved grant budget narrative and budget summary. Second, it helps prepare the Project Director for writing interim and annual reports because it links purchases with grant objectives, which is usually a reporting requirement for state and federal agencies. Keeping electronic copies of purchase requests will streamline the task of gathering documentation at reporting time.

Please note the Grants Director is the signatory for all purchase requests and grant-related travel.

PROJECT DOCUMENTATION

Project documentation is critical because usually a granting agency does not send all the funding at the beginning of project. Rather, the college is periodically reimbursed by the agency after expenditures have occurred. All expenditures must therefore go through the proper channels and be well documented.

As the grant progresses, the Project Director should compare how much time has passed on the grant with how much money has been spent. If only 30% of the funding has been used, but 80% of the project time has elapsed, then something is terribly wrong. This means that the objectives of the grant are not being met and that the college will have to return unspent grant monies. This may jeopardize the college's future chances of receiving funding from the same agency. In addition, it may indicate that expenditures are not being charged to the proper grant account. If this is the case, then the college's operational dollars are being used on a project for which external funds have been designated.

Throughout the project, the Project Director is expected to monitor and review progress. Each year, two (2) to three (3) months before the project end date, it important to take stock and ensure that all contracted activities have been conducted, and that project goals and objectives have either been achieved or are on target for completion.

Double check that:

- All supply, material, and equipment purchases are completed
- All project staff effort is documented and all staff are paid

- Formal project evaluation is completed
- Institutional match and in-kind contributions are completed and documented
- The fiscal report is completed, certified by Grants Accountant, and delivered to the Grants Office a minimum of five (5) days prior to the due date.
- All project reports are finalized.

HOW TO BE PREPARED FOR AN AUDIT

Be sure to keep thorough and complete records of all grant activities. There are a number of documents that you should make sure are on hand in the event of an audit.

- Organization charts
- Written procedures and/or flowcharts for receipts, deposits, disbursements, and invoice preparation for grant reimbursement.
- A document showing the formula or methodology used to determine project-specific office expenses, and back-up documentation used to justify the amount charged.
- Grant Agreements—Original grant and any amendments thereto or budget line item modifications between the grantee and the granting agency
- All subcontractor and consultant contracts and related documents, including selection and award of contracts and subcontracts.
- **Invoices for payments** under the agreement, including invoices from subcontractors/consultants to the grantee for project costs.
- Receipts and Disbursement Documents—Receipts showing grant payments received from the granting agency and deposit slips showing deposit of payments received from the granting agency.
- **Ledgers or registers** showing grant payments and cash disbursements entries.
- **Personnel**—Payment records for grantee and contractor personnel who provided services under the grant, e.g., timesheets, fringe benefit calculations.
- **Travel and Per Diem**—Travel claims for travel costs charged to the grant, with supporting documentation.

• **Project Files**—All supporting documentation maintained in grant project file(s).

BREACH OF AGREEMENT

By entering into an agreement with a state or federal granting agency, the grantee is legally obligated to ensure the project remains within the negotiated timelines. When a project falls behind schedule, the grantee is in breach of agreement, which could jeopardize project funding.

If the grantee's project has an existing documented pattern of not meeting project timelines, including invoice submittal, the granting agency may initiate a breach of agreement in an effort to bring the project back into compliance.

Failure to resolve outstanding issues may result in the termination of the agreement, and the grantee may have to repay all or part of the grant funds. It is, therefore, imperative that the lines of communication be kept open between the Project Director and the Director of the Grants Office.

REFERENCES CITED

Grants/Contracts Management Handbook, Amarillo College

http://www.google.com/url?sa=t&rct=j&q=&esrc=s&source=web&cd=1&ved=0CF MQFjAA&url=http%3A%2F%2Fwww.actx.edu%2Fiea%2Ffilecabinet%2F84&ei=Ss mfUfjGGMPBigKWqoGoCA&usg=AFQjCNF2Me9ziuyaoVEeS28yG1QUshFD8Q&sig2 =lOcB9m44nP0TAo16pyO9pw&bvm=bv.47008514,d.cGE

Grants Handbook, Columbia State Community College http://www.columbiastate.edu/grants-handbook

Project Director Compliance Guide, Appendix A, Riverside City College http://www.rccd.edu/administration/grants/Documents/AppendixA-Rev.Apr 2010 000.pdf

Project Director Resource Guide, California State Water Resources Control Board http://www.waterboards.ca.gov/water issues/programs/grants loans/grant info /docs/pd resource guide oct2012.pdf

Research Foundation Major Responsibilities, State University of New York - Cortland

http://www2.cortland.edu/offices/research-foundation/

Role of the Project Director/Principle Investigator, King's College http://www.kings.edu/noncoms/pdf/RoleOfTheProjectDirector.pdf

APPENDIX

Project Director/PI Agreement

The Project Director (PD) or Principal Investigator (PI) is the individual with the appropriate level of authority and responsibility to direct the project or program supported by the grant. The PD/PI is responsible and accountable to San Bernardino Valley College and San Bernardino Community College District, or, as appropriate, to a collaborating organization, for the proper conduct of the project or program including the submission of all required reports.

The PD/PI serves a critical role in the success of all grant projects by providing administrative oversight, budget management, and accurate reporting. Below are the key responsibilities of the PD/PI. Please read, print, and sign below confirming your knowledge/acceptance of these responsibilities before commencing grant project activities.

- 1. I understand and agree to carry out this project with the highest professional standards and within the time period specified.
- 2. I assume responsibility to read, understand, and comply with all of the terms and conditions contained in this grant application, a copy of which is attached for my records. Should any conflict arise regarding the terms, conditions, period of performance, or budget of the project, I must notify the Grants Office immediately.
- 3. I understand my responsibilities, and agree to abide by both SBVC, SBCCD, and funding agency policies including but not limited to patents, conflict of interest, drug-free workplace, lobbying, consulting, scientific conduct, procurement, personnel and accounting.
- 4. I agree to inform and ensure compliance with such applicable terms and conditions of the grant as well as the policies of SBVC and SBCCD, as referenced above, on all persons working on this project.
- 5. I will ensure that all publications and presentations resulting from work on this project will include a proper disclaimer and acknowledgment of sponsorship as required by the funding agency, whether written or oral, as presented by myself or any others involved in the project.
- 6. I will manage the grant budget according to SBVC and SBCCD policies and obtain prior approval from the Grants Office Director.
- 7. I will submit any changes to the grant budget, scope of work or period of performance for approval in writing to the Grants Office.
- 8. I accept responsibility to prepare and submit required reports and documentation within the grant-specified deadlines.
- 9. I will maintain a current office hour card and documentation of my work funded by the grant on monthly time-and-effort reports, to be signed by me and my supervisor.
- 10. I certify that I have read the Project Director's Handbook in its entirety. By signing this agreement, I hereby agree to all of its terms and conditions.

Signed and Agreed to by:	
Principal Investigator (signature)	Date
Principal Investigator (print)	

Grant Personnel Agreement

As a member of the key personnel participating in this grant project, you are responsible and accountable to San Bernardino Valley College and San Bernardino Community College District, or, as appropriate, to a collaborating organization, for the proper conduct of the project or program.

Please read, print, and sign below confirming your knowledge/acceptance of the following responsibilities before commencing grant project activities.

- 1. I understand and agree to carry out this project with the highest professional standards and within the time period specified.
- 2. I assume responsibility to read, understand, and comply with all of the terms and conditions contained in this grant application, a copy of which is attached for my records. Should any conflict arise regarding the terms, conditions, period of performance, or budget of the project, I must notify the Grants Office immediately.
- 3. I understand my responsibilities, and agree to abide by both SBVC and funding agency policies including but not limited to patents, conflict of interest, drug-free workplace, lobbying, consulting, scientific conduct, procurement, personnel and accounting.
- 4. I agree to inform and ensure compliance with such applicable terms and conditions of the grant as well as the policies of SBVC and SBCCD, as referenced above, on all persons working on this project.
- 5. I will ensure that all publications and presentations resulting from work on this project will include a proper disclaimer and acknowledgment of sponsorship as required by the funding agency, whether written or oral, as presented by myself or any others involved in the project.
- 6. I will maintain documentation of my work funded by the grant on monthly time-and-effort reports, to be signed by me and my supervisor.

By signing this agreement, I hereby agree to all of its terms and conditions.

Signed and Agreed to by:						
(Signature)	 Date					
(Print full name)						

Frequently Asked Questions to Assist U.S. Department of Education Grantees To Appropriately Use Federal Funds for Conferences and Meetings

Using Federal Grant (Discretionary and Formula) Funds to Host a Meeting or Conference

1. May a grantee receiving funds from the U.S. Department of Education (Department) use its Federal grant funds to host a meeting or conference?

Yes. Federal grant funds may be used to host a meeting or conference if doing so is:

- a. Consistent with its approved application or plan;
- b. For purposes that are directly relevant to the program and the operation of the grant, such as for conveying technical information related to the objectives of the grant; and
- c. Reasonable and necessary to achieve the goals and objectives of the approved grant.

2. What are examples of "technical information" that may be conveyed at a meeting or conference?

Examples of technical information include, but are not limited to, the following, each of which must be related to implementing the program or project funded by the grant:

- Specific programmatic, administrative, or fiscal accountability requirements;
- Best practices in a particular field;
- Theoretical, empirical, or methodological advances in a particular field;
- Effective methods of training or professional development; and
- Effective grant management and accountability.

3. What factors should a grantee consider when deciding whether to host a meeting or conference?

Grantees should consider whether a face-to-face meeting or conference is the most effective or efficient way to achieve the desired result and whether there are alternatives, such as webinars or video conferences, that would be equally or similarly effective and more efficient in terms of time and costs than a face-to-face meeting. In addition, grantees should consider how the meeting or conference will be perceived by the public; for example, will the meeting or conference be perceived as a good use of taxpayer dollars?

4. Are there conflict-of-interest rules that grantees should follow when selecting vendors, such as logistics contractors, to help with a meeting or conference?

Grantees, other than States, must, as appropriate, comply with the minimum requirements in 34 CFR 74.42 and 80.36(b)(3) and should follow their own policies and procedures (or their local or State policies, as applicable) for ensuring that there are no conflicts of interest in the procurement process.

5. When a meeting or conference is hosted by a grantee and charged to a Federal grant, may the meeting or conference be promoted as a U.S. Department of Education event?

No. Meetings and conferences hosted by grantees are directed by the grantee, not the U.S. Department of Education. Therefore, the meeting or conference may <u>not</u> be promoted as a U.S. Department of Education meeting or conference, and the seal of the U.S. Department of Education must <u>not</u> be used on conference materials or signage without Department approval. In addition, all meeting or conference materials paid for with Federal grant funds must include appropriate disclaimers, such as the following, which is provided in EDGAR § 75.620 and states:

The contents of this (insert type of publication; e.g., book, report, film) were developed under a grant from the U.S. Department of Education. However, those contents do not necessarily represent the policy of the U.S. Department of Education, and you should not assume endorsement by the Federal Government.

Using Federal Grant Funds to Pay for Food

6. When a grantee is hosting a meeting, may the grantee use Federal grant funds to pay for food, beverages, or snacks?

Generally, there is a very high burden of proof to show that paying for food and beverages with Federal funds is necessary to meet the goals and objectives of a Federal grant. When a grantee is hosting a meeting, the grantee should structure the agenda for the meeting so that there is time for participants to purchase their own food, beverages, and snacks. In addition, when planning a meeting, grantees may want to consider a location in which participants have easy access to food and beverages.

While these determinations will be made on a case-by-case basis, and there may be some circumstances where the cost would be permissible, it is likely that those circumstances will be rare. Grantees, therefore, will have to make a compelling case that the unique circumstances they have identified would justify these costs as reasonable and necessary.

If program offices have questions, they should consult with their program attorney.

7. May Federal grant funds be used to pay for food and beverages during a reception or a "networking" session?

In virtually all cases, using grant funds to pay for food and beverages for receptions and "networking" sessions is not justified because participation in such activities is rarely necessary to achieve the purpose of the meeting or conference.

8. May a grantee enter into a contract with a hotel under which Federal grant funds will be used to provide meals, snacks, and beverages as part of the cost for meeting rooms and other allowable conference-related costs?

Federal grant funds may only be used for expenses that are reasonable and necessary. In planning a conference or meeting and negotiating with vendors for meeting space and other relevant goods and services, grantees may only pay for allowable costs. If a hotel vendor embeds food and beverage costs into a hotel contract for meeting space, the grantee should work with the hotel to have the food and beverage costs identified and "backed out" of the contract, and have the price they are paying for meeting space appropriately adjusted to reflect the fact that food and beverages are not being purchased. The fact that food and

beverages are embedded in a contract for meeting space does not mean that the food and beverages are being provided at no cost to the grantee.

9. What if a hotel or other venue provides "complimentary" beverages (e.g., coffee, tea) and there is no charge to the grantee hosting the meeting?

The grantee has an obligation, under these circumstances, to confirm that the beverages are <u>truly</u> complimentary and will not be reflected as a charge to the grant in another area. For example, many hotels provide complimentary beverages to all guests who attend a meeting at their facility without reflecting the costs of those beverages in other items that their guests or, in this case, the grantee purchases. As noted above, it would not be acceptable for a vendor to embed the cost of beverages in other costs, such as meeting space.

10. May indirect cost funds be used to pay for food and beverages?

The cost of food and beverages, because they are easily associated with a specific cost objective, such as a Department grant, are properly treated as direct costs, rather than indirect costs. As noted above, Federal grant funds cannot be used to pay for food and beverages unless doing so is reasonable and necessary.

11. May Federal grant funds be used to pay for alcoholic beverages?

No. Use of Federal grant funds to pay for the cost of alcoholic beverages is strictly prohibited.

12. May a grantee use <u>non-Federal</u> resources (e.g., State or local resources) to pay for food or beverages at a meeting or conference that is being held to meet the goals and objectives of its grant?

Grantees should follow their own policies and procedures and State and local law for using <u>non-Federal</u> resources to pay for food or beverages, including its policies and procedures for accepting gifts or in-kind contributions from third parties. However, if non-Federal funds are used to pay for food at a grantee-sponsored meeting or conference, the grantee should make clear through a written disclaimer or announcement (e.g., a note on the agenda for the meeting) that Federal grant funds were not used to pay for the cost of the food or beverages. Grantees should also be sure that any food and beverages provided with non-Federal funds are appropriate for the grantee event, and do not detract from the event's purpose.

13. May grantees provide meeting participants with the option of paying for food and beverages (e.g., could a grantee have boxed lunches provided at cost for participants)?

Yes. Grantees may offer meeting participants the option of paying for food (such as lunch, breakfast, or snacks) and beverages, and arrange for these items to be available at the meeting.

<u>Using Federal Grant Funds to Pay for Costs of Attending a Meeting or Conference</u> Sponsored by ED or a Third Party

14. May grantees use Federal grant funds to pay for the cost of attending a meeting or conference?

If attending a meeting or conference is necessary to achieve the goals and objectives of the grant, <u>and</u> if the expenses are reasonable (based on the grantee's own policies and procedures, and State and local laws), Federal grant funds may be used to pay for travel expenses of grantee employees, consultants, or experts to attend a meeting or conference. To determine whether a meeting or conference is "necessary," grantees should consider whether the goals and objectives of the grant can be achieved without the meeting or conference and whether there is an equally effective and more efficient way (in terms of time and money) to achieve the goals and objectives of the grant (see question #3). To determine whether the expenses are "reasonable," grantees should consider how the costs (e.g., lodging, travel, registration fees) compare with other similar events and whether the public would view the expenses as a worthwhile use of Federal funds.

15. What should a grantee consider when planning to use Federal grant funds for attending a meeting or conference?

Among other considerations, grantees should consider how many people should attend a meeting or conference on its behalf. The number of attendees should be reasonable and necessary to accomplish the goals and objectives of the grant. The grantee should also determine whether it is necessary to attend the entire meeting or conference, or whether attending only a portion of the meeting or conference is reasonable and necessary.

16. What travel expenses may be paid for with Federal grant funds?

Grantees may use Federal grant funds for travel expenses only to the extent such costs are reasonable and necessary and do not exceed charges normally allowed by the grantee in its regular operations consistent with its written travel policies. In the absence of an acceptable written policy regarding travel costs, grantees must follow the Federal travel and subsistence rates established by the General Services Administration. 48 CFR 31.205-46(a) (established under subchapter I of Chapter 57, Title 5, United States Code ("Travel and Subsistence Expenses; Mileage Allowances")). Federal grant funds may be used to pay expenses for transportation, per diem, and lodging if the costs are reasonable and necessary. Grantees should follow their own travel and per diem rules and costs when charging travel expenses to their Federal grant. As noted in the cost principles, grantees that do not have travel policies must follow:

...the rates and amounts established under subchapter I of Chapter 57, Title 5, United States Code ("Travel and Subsistence Expenses; Mileage Allowances"), or by the Administrator of General Services, or by the President (or his or her designee) pursuant to any provisions of such subchapter shall apply to travel under sponsored agreements (48 CFR 31.205-46(a)).

See 2 CFR Parts 220, 225, and 230.

Questions Regarding the Allowable Use of Federal Grant Funds

17. What resources are available to help grantees determine whether costs associated with meetings and conferences are reasonable and necessary?

Grantees must follow all applicable statutory and regulatory requirements in determining whether costs are reasonable and necessary, especially the U.S. Office of Management and Budget's Cost Principles for Federal grants that are set out at:

- 2 CFR Part 225 (OMB Circular A-87; State, Local, and Indian Tribal Governments), (http://www.gpo.gov/fdsys/pkg/CFR-2011-title2-vol1/xml/CFR-2011-title2-vol1-part225.xml);
- 2 CFR Part 220 (OMB Circular A-21; Educational Institutions), (http://www.gpo.gov/fdsys/pkg/CFR-2011-title2-vol1/xml/CFR-2011-title2-vol1-part220.xml); and
- 2 CFR 230 (OMB Circular A-122; Non-Profit Organizations) (http://www.gpo.gov/fdsys/pkg/CFR-2011-title2-vol1/xml/CFR-2011-title2-vol1-part230.xml).

18. May Federal grant funds be used to pay for entertainment?

Federal grant funds may not be used to pay for entertainment, which includes costs for amusement, diversion, and social activities.

19. Is it allowable for a person whose travel costs are being paid with Federal grant funds to attend a conference in Washington, DC, and lobby members of Congress while in town?

Appropriated funds may not, except under very limited circumstances, be used for expenses related to any activity designed to influence the enactment of legislation, appropriations, regulations, administrative actions, or Executive Orders proposed or pending before the Congress or the Administration. To the extent that a portion of time at a conference is spent on lobbying activities, costs associated with the lobbying, including transportation to and from Washington, DC, lodging, and per diem, may not be charged to the Federal grant. For example, if a meeting or conference lasts for two days and a visit to lobby a member of Congress requires an additional day of travel, 1/3 of all costs involved in attending the meeting or conference, including travel to and from Washington, DC, may not be charged to the grant.

20. What are the consequences of using Federal grant funds on unallowable expenses?

The Department may seek to recover any Federal grant funds identified, in an audit or through program monitoring, as having been used for unallowable costs, including unallowable conference expenses.

21. Whom should grantees call if they have specific questions about the allowable use of Federal grant funds?

Initial contact should be through your institution's grant office. The Authorized Organizational Representatives for grantee institutions are encouraged to contact their U.S. Department of Education program officer to discuss the allowable use of Federal grant funds, including the allowable use of Federal grant funds for meetings and conferences.

¹ 2 CFR Part 230 (Cost Principles for Non-Profit Organizations), Appendix B., 25(b) and 2 CFR Part 220 (Cost Principles for Educational Institutions), 28(b).

Sample Time and Effort Report for Employees

HSI-STEM and Articulation PASS GO Program

Time and Effort Report for Employees

Reporting	g Period: March 2012 (EXAMPLE! This presumes 50% assignment to t	:he grant.)		
Employe	e: SSN:last 4 di	gits		_
Position ⁻	Title:	_		
Percent c	of time (or hours) devoted to grant: HSI-STEM PASS GO	Non-	HSI-S	TEM
College: <u>S</u>	<u>SBVC</u>			
Week	Descriptive Task	% of time spent HSI- STEM hours work)	(or of	% of time of hours Non- HSI- STEM
1	Reorganize office files. Create Year 1, Year 2 files. Develop proposa for submission (Non-NSI-STEM duties 50%).	ls 50%	%	50%
2	Trip to San Antonio, TX for Grant Administrator's Conference. Othe work related to grant duties (Non-HSI-STEM).	er 50%	%	50%
3	Serve on HR committees to hire new staff positions. Manage and report on grant activities, budgets, and coordinate with partners (CSUSB and evaluator). Other grant-related duties (Non-HSI-STEM)	509	%	50%
4	Reorganize files: Create Grant's Management files, HSI-STEM PASS section on grant models, other grants, etc. Met with staff on what learned at the conference. Facilitate meetings for new grant development (Non-HSI-STEM).	GO, 509	%	50%
Total		509	%	50%
Employee distribut i	unds usage requires this: e Signature: I considered in conjunction with other reporting periods.	confirm that by me durin		e stated
Superviso	or Signature: I	confirm tha	t I ha tivity	ive first-
represen	ts a reasonable estimate of work performed during the stated period	od when cor	rside	red in

conjunction with other reporting periods.

Document Time Dedicated to Classes/Office Hours/Grant Work

FIRST_	V\	/EEK/MONTH/TERM	MOFFICE	PHON	IE
MONDAY	TUESDAY	WEDNESDAY	THURSDAY	FRIDAY	ROOM
	MONDAY	MONDAY TUESDAY	MONDAY TUESDAY WEDNESDAY	MONDAY TUESDAY WEDNESDAY THURSDAY	MONDAY TUESDAY WEDNESDAY THURSDAY FRIDAY

San Bernardino V	Valley Colle	ge Grant Off	ice Purchas	e Requisition Approval Form	
Name of grant associated	d with reques	t for PR:			
Date request submitted:					
When is it due? (complete only if related to a calendared event or board approval contract or item):					
Requestor's name, title, a	and contact i	nformation (e	mail address	, complete phone number):	
Please describe the	nature of	the propo	sed exper	nse:	
Please describe how objective:	w the purc	hase of th	is product	/service fulfills a grant	
Objective # (as shown in	grant):	Objective or	utcome (as w	ritten in grant, include page #):	
Amount:	Vendor information:				
Approved (signed):			Rejected (re	eason):	
PR#	Account#			Date Created:	
Priority (assigned by gran	it office):				
Remarks:					

San Bernardino Community College District Travel Claim Form

SAN BERNARDINO COMMUNITY COLLEGE DISTRICT TRAVEL CLAIM FORM

Date of Board meeting Approving Event											
PART A: GENERAL DATA											
NAME OF EMPLOYEE: (Please Type or Print)											
	Name of Conference, Meeting, Etc.										
							to				
	City	& State	mom			20	to			20	
	Ony	d otato									
PART B: ADVANCE REQUEST - COMPLETE PART B ONLY IF REQUESTING AN ADVANCE											
	Note: If travel requires board approval, advance request will not be processed until travel is approved by the Board of Trustees. Please attach Conference Literature & Hotel Information.										
Estimate	ed Cash Expen	ditures:	Amo	unt	PO Nu	mber		ertify that the			
Trave	l (airfare, milea	ge)	\$					travel expense Advance sha			
Hotel			\$				of Part C	below within to	nirty (30) day	ys of event. If	the travel
Meals	5		\$					ed, advance w lays from date			
Regis	tration		\$					the advance gl			
Misce	ellaneous (park	ing,						ept. to deduct			
	uttle, taxl, etc.)		\$								
Total Est			\$								
Advance	Request at 80	%	\$					Requestor			Date
Respons	Sibility Center N	Manager			Date		- 1	nting Office Us	•		
Adminis	trator/Presiden				Data		Warran	t#	Amo	unt	
Adminis	trator/Presiden	I.		Date			Date Is:	sued	P.O.	#	
							-				
Chancel	ior				Date						
PART (C: EXPENS	E REPOR	T - COMP	LETE THIS	PART WH	IEN TRIP	VEVENT IS C	OMPLETED)		
	Conference L	Iterature Re	egulred								
	Original Rece					ude all tips)				
DATE	BREAKFAST	LUNCH	DINNER	NUMBER	AMOUNT	HOTEL	REGISTRATION	CAR RENTAL	TRAVEL	PARKING	TOTAL
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	Travel Expens										
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		_								878	
	that the above certify that the						th the provisions	of Education	Code Sectio	ns 87032.	
Claimant's Signature Date											
Approva		_									
	sibility Center_					Date:			P.O		
Presider						Date:			Amt		
AC-10 Ur	dated 11-08				DIS	STRICT OF	FICE				

Individual Request for Conference Attendance and Funding

SAN BERNARDINO COMMUNITY COLLEGE DISTRICT

REQUEST FOR CONFERENCE ATTENDANCE

1.	1. Name of EmployeeCampus	Div
2.	Name of Conference	
3.	Agency Sponsoring Conference	
4.	4. Conference Location: City State	
5.	5. Conference Schedule: Start Date Finish Date_	
6.	6. Dates on which employee will be traveling and attending conference (include wee	kends and holidays):
	Beginning Date Ending Date	
7.	7. Will paid substitute be required: Yes No	
8.	8. Purposes and anticipated value to the District which will be derived from attendar	nce:
9.	Funds for this conference are being compensated and have been approved by:	
	() Staff Development \$ () Academic Senate \$	
	() Other)\$	
	Budget No	
	[Transportation \$ Registration \$ Hotel \$ Meals \$	Total \$]
10.	10. Signature of applicant	
11.	11. This section to be completed by appropriate Division Dean, Vice President and Colle	
	() Approved () Not Approved	
	Division Dean	
	Vice President	
	President/Administrator	
	Board Approval Date	
	(This request must have PRIOR APPROVAL by the SBCCD Board of Trustees if the co and/or exceeds \$1,000.00)	nference is out of state

Copies: White-President/Administrator Yellow-Vice President Pink-Responsibility Center Gold-Employee

Form AC-9

(Revised 2008)