Riverside Community College District Policy

BP 3280 GRANTS

Reference:
Education Code Section 70902

Riverside Community College District embraces the acquisition of extramural funding to support District mission, goals and initiatives.

The Chancellor shall establish procedures to inform the Board of grant activity and to govern the approval, application, processing, and implementation of grants.

Date Adopted: November 18, 2008
Revised: December 15, 2009
Purpose
One of the District’s primary roles is to secure funding to support institutional efforts to enhance the learning environment for students. In addition to local, state, and federal funding, this effort includes the pursuit of private and public grants through the Grants Office and for grants less than $100K, from individual college, District or foundation personnel. These procedures apply to all grants, both federal and non-federal. All federal and state grants must be submitted by the District Grants Office. All private, corporate, and philanthropic applications, and all grants requiring non-profit registration or 501(c)(3) status, must be submitted by the Riverside Community College District Foundation.

Roles and Responsibilities
Funding opportunities that are pursued will align with and support the strategic plans of the District and colleges, as applicable, and be one which the respective District department/college has the expertise and available resources to competitively win and successfully implement. District departments/colleges will determine which funding opportunities to pursue.

The Grants Office serves the District and colleges by providing Grant Development Assistance, Grant Implementation Support Services and Technical Assistance. Each fall, the Grants Office will present the Board of Trustees with a listing of grant opportunities identified and approved by District departments/colleges for which the District/colleges intend to apply in the coming academic year. Each winter, the Grants Office will update the Board on the progress and status of grant opportunities, applications and awards. Each spring, the Board will be informed about the status of all grant applications.

I. Grant Development Assistance for Grants $100K and Over:

   1. To align articulated needs and goals with potential grant funding opportunities, the Grants Office will participate in the appropriate committees of the three colleges, the Foundation, and the District as requested.

   2. The Grants Office will work with senior administrators at the district, and each college, to agree on, and approve, a master list of potential grant submissions. After District Executive Cabinet approval, the list will be included in the fall Grants Office report to the Board.

      o Grants approved in this manner will have undergone individual analysis and approval as outlined below.

      o Additional grant requests not identified on this list will be subject to review and approval as detailed in this procedure.

      o Grant requests for less than $100K would be processed according to the procedures for small college/District-based grants.
3. Once a potential source of funding is identified, the Grants Office will provide the college administration and faculty, or District administration with information about the grant and an opinion regarding the feasibility of winning an award.

4. Each college or District department will conduct an analysis of the grant to determine whether the grant aligns with the strategic plan of the college or District, to identify the impact of the grant on all operational areas, and to ascertain whether the college or District department possesses the expertise and resources to successfully implement the grant. This analysis will be conducted according to the process established by the respective college or District department and may involve college and District administrators responsible for the areas determined to be impacted by the grant, including the areas of Information Services, Facilities Planning and Development, Administration and Finance and Institutional Research. A Sample Funding Opportunity Analysis tool is available on the Grants Office web-site and may be utilized to guide this process.

5. If this analysis results in a decision to develop an application, the Chancellor/College President, or designee will notify the Grants Office administration by sending a written approval.

6. The content developer(s) will participate in the proposal development process with the Grants Office team members. The Grants Office will provide complete support in the development of the grant budget.

7. The Chancellor, college President, or designee, will work in collaboration with the Grants Office to determine the indirect rate to be charged in the grant (the minimum being 10% and a maximum being our full approved rate, unless alternatively prescribed by the funding agency).

8. Draft budgets for college grants will be forwarded to the College Vice President of Business Services for preliminary review.

9. The college President/highest level administrator of a District department will advise the Grants Office which individual has been designated as the grant administrator for the project. The content developer working with the Grants Office team will be advised of submission requirements and will be given a timeline of necessary deadline dates for a successful submission. In the event that deadline dates cannot be met, and this will impede successful submission, the Grants Office will send an e-mail apprising the grant administrator of the situation. After discussion with the content developer(s), the grant administrator will advise the Grants Office, in writing, of the proposed course of action.

10. The college Vice President of Business Services will review and approve the final grant budget and e-mail the Grants Office an approval.

11. The Grants Office will forward the approved grant budget and e-mail to the District Budget Office for review. Unless the District Budget Office review results in significant budget changes, the Grants office will proceed with the processing of the final application and will coordinate with the Administration and Finance Office and other necessary signatories to obtain final signatures.

12. In the event that more than one college intends to apply for the same grant program, and multiple submissions are not allowed or would negatively impact the probability of award, the matter will be discussed and decided by the Executive Cabinet. The Grants Office will be informed of the decision.

13. In the event that the collective workload of the Grants Office cannot accommodate the approved grant request, they will advise the college or District administration of the support that can be provided. Consideration of hiring a
consultant or faculty member to write the grant can be addressed with college/District administrators at this time.

14. The Grants Office will assist individuals in the revision and resubmission of unfunded proposals.

II. Grant Development Process for Grants Under $100K:

1. Once a potential source of funding is identified, the college/District leadership will decide whether or not to pursue the funding opportunity. If the grant meets eligibility for submission by the RCCD Foundation, an approval by the RCCD Foundation Director must be obtained.

2. If an individual obtains college/District approval and submits a grant without the assistance of the Grants Office, the Vice President of Business Services, or designee, or the District/college administrator who approves the submission, will provide oversight to the submission of the grant. A copy of the final application package will be provided to the Grants office and the District Budget Office, in electronic format.

III. Grant Development Process for All Grants

1. No grant applications may be submitted without respective college or District leadership approval. All private, corporate, and public foundation grants must meet the standards of and be submitted by the RCCD Foundation. If a grant requires that the applicant be a 501(c)3 organization, the applicant must be the RCCD Foundation. Such grants require prior review and written approval by the Foundation Director, with a timeline for the application process developed between the applicant, the Foundation Director, and the Grants Office.

2. The RCCD Foundation may also initiate grant requests that meet college or District priorities. If a Foundation grant request impacts college/district resources, the request must be submitted to the college/District for approval. If the Foundation office is requesting Grants Office support, the request must be submitted via an e-mail that describes the funding opportunity and indicates which strategic initiative it supports, for review by the Grants Office and the college/district. Foundation opportunities that do not address a Board-approved initiative or those that do, but are determined to impact personnel, resources, or facilities, will be addressed according to the grant development flowchart. If the process results in a request for Grants Office assistance, the grant will be prioritized appropriately within the confines of the above procedures.

IV. Grant Implementation Support Services:
Colleges and District departments that receive a grant award will be responsible for its successful implementation and compliance with all applicable regulatory and audit requirements. This includes support to the project director in initiating, authorizing and implementing all grant-related activities. All staff who are responsible for administering federal and non-federal grants will comply with all District policies and administrative procedures that address how they are to carry out their responsibilities.

1. The Grants Office is available to provide training and consultation services that include:
   A. Training geared toward project directors to facilitate a best practices approach to grant management. Project directors will be given a list of responsibilities (see appendix A) available resources (see appendix B)
and an issue-identification tool (see appendix C). Training will be offered every academic year. A minimum of two workshops will be offered each academic year on each campus.

B. Training for current and potential project directors in audit-readiness for effective practices in compliance. A minimum of two workshops will be offered each academic year on each campus.

C. Training for project directors in preparing for year-end closing requirements. A workshop will be offered each academic year on each campus.

D. An individual training for new project directors and their grant administrators to facilitate a best-practices approach to grant management, upon request. The training will include discussion of compliance responsibilities (see appendices A and C).

All training is based on principles for administering federal grants and includes content derived from EDGAR and OMB Circulars A-21, A-110 and A-133.

2. The District Finance Office (consisting of budget, purchasing, accounts payable, payroll, etc.) is available to provide training and consultation services related to budget and fiscal matters, including training on the use of the Galaxy System, business processes, practices and procedures. College Vice Presidents of Business Services are the primary contacts for business and fiscal matters related to a respective college and also provide periodic and “as needed” training opportunities.

3. Although the project director has authority to make all final grant-related decisions, if a compliance issue is raised to the Grants Office, the office will respond to the project director and grant administrator with a recommendation for compliance.

4. Project directors will retain all grant records in accordance with the grant agreement and make them available to the Grants Office and Administration and Finance when requested.

Technical Assistance:
The Grants Office and the District Budget Office will provide technical assistance related to grant implementation, budget matters and the development of any needed contracts when requested. The type of assistance provided will be tailored to meet the individual requirements of the grant.

Office of Primary Responsibility: Vice Chancellor Educational Services

Date Approved: September 22, 2008
Revised: September 14, 2009
Revised: April 20, 2010
Revised: February 27, 2012
Revised: January 29, 2013
Revised: February 23, 2015
Appendix A

Sample Project Director Responsibilities

- Fully understanding the terms and conditions of the grant they are responsible for directing.
- Participating in training workshops provided by Grants Office: Best Practices in Grant Management, Audit-Readiness, and Year-End Closing requirements in addition to any required granting agency training.
- Keeping representatives from all areas of the college and district that are impacted by the implementation of the grant informed as to the grant’s progress.
- Completing and reviewing the Sample Project Director Issue Identification Tool with their supervisor along with any grant reports showing progress toward the objectives of the grant.
- Providing copies of completed grant applications, grant award documents, documentation reflecting agency-approved revisions, and all program reports to the Grants Office and the District Budget Office.
- Maintaining a calendar of significant deadlines for the grant they direct.
- Facilitating communications among all stakeholders (e.g. district, college and external partners).
- Ensuring compliance with the grant agreement, all applicable federal, state and other regulations listed in the grant award, and adhering to district policies, including those related to year end closing and budget development. Applicable federal regulations include EDGAR, OMB Circulars A-21, A-110 and A-133 as well as specific terms and conditions of award stipulated by each respective federal agency.
- Ensuring that the budget and associated expenditures in the district’s ledgers (Galaxy) accurately reflect the approved budget awarded by the granting agency.
- Keeping records suitable for audits.
- Accurately monitoring all expenditures over the course of the grant.
- Verifying the faculty load for each semester of the grant being proposed and remaining within required limits.
- Ensuring that FTE allocations to the grant are registered with and approved by the necessary individuals.
- Preparing and submitting all required Board materials and fiscal transactions, such as budget transfers.
- All program and fiscal reporting connected with the grant, including adherence to reporting deadlines.
- Providing the required notice of termination of employment to staff funded by the grant.
- Note: All fiscal reports require review by the District Budget Office prior to submission. A minimum of two weeks’ lead time should be allowed for these reviews.
Grant Management and Compliance Resources

- Associate Director Grants  x8932
- Grant award notification (cites applicable regulations)
- Code of Federal Regulations (CFRs) @ http://www.gpoaccess.gov/cfr/index.html
- Education Department General Administrative Regulations (EDGAR) @ http://www.ed.gov/policy/fund/reg/edgarReg/edgar.html
- Office of Management and Budget (OMB) Circulars @ http://www.whitehouse.gov/omb/circulars/index.html
- Federal Grants Management Forms @ http://www.whitehouse.gov/omb/grants/grants_forms.html
- U.S. Department of Education Grants Forms @ http://www.ed.gov/fund/grant/apply/appforms/appforms.html
- Office of Inspector General (audit reports and findings) @ http://www.ed.gov/about/offices/list/oig/areports.html
## Sample Project Director Issue Identification Tool

As a project director, ultimate responsibility for the administration of your grant and compliance with all applicable regulations vests in you. This issue identification tool has been developed to enhance your readiness for the project director role by helping you to identify any areas that may require action on your part. It is not mandatory, but rather a recommendation that you complete the survey, develop an action plan to address any areas that received a negative response and share both documents with your supervisor.

<table>
<thead>
<tr>
<th>#</th>
<th>Question</th>
<th>Response</th>
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<tbody>
<tr>
<td>1</td>
<td>I understand that any compliance violation jeopardizes the district’s ability to secure future federal funding, including federal student financial aid.</td>
<td>Yes</td>
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<tr>
<td>2</td>
<td>I have read my grant application in its entirety.</td>
<td></td>
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<tr>
<td>3</td>
<td>I have read and fully understand all of the terms and conditions of the grant that I administer.</td>
<td>Yes</td>
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<td>4</td>
<td>I have participated in all training workshops provided by Grants Office (GO).</td>
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<tr>
<td>5</td>
<td>I have provided the GO with copies of all program reports, grant award documents, completed grant applications, and any documentation reflecting agency approved revisions.</td>
<td>Yes</td>
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<tr>
<td>6</td>
<td>I have maintained a calendar of significant deadlines for my grant to ensure that all deliverables are completed on time.</td>
<td>Yes</td>
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<td>7</td>
<td>I know and adhere to all district policies relating to the implementation of my grant’s activities.</td>
<td>Yes</td>
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<td>8</td>
<td>I have ensured that the budget and associated expenditures in the district’s ledgers (Galaxy) accurately reflect the approved budget awarded by the granting agency.</td>
<td>Yes</td>
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<td>9</td>
<td>I utilize Galaxy to ensure that all expenditures posted to my grant account are accurate and allowable.</td>
<td>Yes</td>
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<td>10</td>
<td>I have obtained written approval for all revisions and maintain them on file.</td>
<td>Yes</td>
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<tr>
<td>11</td>
<td>If my grant requires a match, I have ensured that the match contribution is met and is comprised of allowable expenditures.</td>
<td>Yes</td>
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<tr>
<td>12</td>
<td>I have created and maintained records suitable for audits in my day-to-day operations.</td>
<td>Yes</td>
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<td>13</td>
<td>If I employ faculty in my program, I have ensured that his/her collective teaching load remains within the required limits.</td>
<td>Yes</td>
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<td>14</td>
<td>I have ensured that staff allocations to the grant are registered with and approved by the necessary individuals.</td>
<td>Yes</td>
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<td>15</td>
<td>I have in my possession all of the agreements and handbooks required for the management of staff (e.g. CTA and CSEA agreements, classified staff handbook).</td>
<td>Yes</td>
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<td>16</td>
<td>I have consistently met all reporting deadlines established for the grant.</td>
<td>Yes</td>
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<tr>
<td>17</td>
<td>I have allowed sufficient time for fiscal reports to be reviewed by the District Budget Office prior to submission.</td>
<td>Yes</td>
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<tr>
<td></td>
<td>My performance report data is accurate and reliable. I have evidentiary documentation to demonstrate this.</td>
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<td>--------------------------------------------------------------------------------------------------------</td>
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<tr>
<td>19</td>
<td>I document my deliverables (e.g. materials created, students served).</td>
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<tr>
<td>20</td>
<td>I am proficient in preparing and submitting all required Board materials and fiscal transactions, such as final budget allocation worksheets and budget transfers.</td>
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<td>21</td>
<td>I check to see that sub-awardees are not disbarred.</td>
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<tr>
<td>22</td>
<td>I ensure that all sub-awardees perform and adhere to all audit requirements.</td>
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<tr>
<td>23</td>
<td>If I’m not sure if an activity or expenditure is allowable and the regulations do not address it, I contact my program officer before proceeding.</td>
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<td>24</td>
<td>My staff and I complete the required personnel statements at required intervals.</td>
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<td>25</td>
<td>I educate my staff and sub-awardees about how their role contributes to the success of the grant and inform them of the regulations that apply to them.</td>
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<td>26</td>
<td>I have an effective evaluation plan in place.</td>
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Project Director’s Signature:__________________________________________________

Supervising Administrator’s Signature _________________________________________

Didn’t receive a perfect score? Don’t despair! You’re action plan along with the resources available to you through the Grants Office will get you there!