

AP 4011 GRANTS – GRANT MANAGEMENT and IMPLEMENTATION

Reference:

Code of Federal Regulations Title 2, Subtitle A, Chapter II, Part 200

Procedure Statement

Riverside Community College District is committed to the efficient and effective implementation of grant award agreements on time, within budget and in compliance with the grantor policies, procedures, and requirements.

Procedure Rationale

Effective grant management requires adherence to institutional policy and procedures, the grant award agreement, the funding guidance and the funding mandate. Deviation from any of these requirements may result in project delays, an audit finding and/or the need to return funding to the granting source.

The District will develop, maintain, and adhere to grant management practices that comply with state and federal policies and procedures in the following areas:

PROCUREMENT

The District shall develop procurement processes and practices for procuring goods and services needed to carry out external grant awards in accordance with AP 5304 Bids and Contract. As appropriate, institutional procurement processes for grant awards may vary if specific requirements set out in the grant award agreements, as well as other more restrictive, state, federal and District policies and procedures regarding the procurement of goods and services exist.

CONFLICT OF INTEREST

Board Policy/Administrative Procedure 1710 Conflict of Interest will apply to all grants and contracts received, managed and implemented by the District and its colleges. No Governing Board member, District employee or District representative shall participate in the selection, award or administration of a contract supported by external grant funds if they have a real or apparent conflict of interest, such as when they or a member of their immediate family, their partner or an organization which employs or is about to employ any of them has a financial interest in or a tangible personal benefit from a firm considered for a contract. Such persons are prohibited from soliciting or accepting gratuities, favors or anything of monetary value from contractors or subcontractors unless the gift is an unsolicited item of nominal value.

PERIOD OF PERFORMANCE

The District shall establish operating practices to ensure that all obligations of external grant funds shall occur on or between the beginning and ending dates of the grant project and shall be paid no later than 90 days after the end of the funding period (or sooner as specifically

outlined in a grant award agreement), unless specifically authorized by the grant award to be carried over beyond the initial term of the grant.

CASH MANAGEMENT

The District shall establish operating practices regarding cash management, payments and cost transfers in accordance with generally acceptable principles and practices. At a minimum, these practices shall minimize the time elapsing between the transfer of grant funds to the District and the District's disbursement of funds, particularly in regard to federal grant funding, which is governed by 2 Code of Federal Regulations 200.305, and requires that funds are disbursed within three days of transfer. When authorized by law, the District may receive advance payments of grant funds. Except under specified conditions, the District shall maintain the advance payments in an interest-bearing account. The District shall track interest earned on the advanced payment and report these earnings to the awarding agency as required

In addition, the District shall maintain accurate and timely accounting records with the proper classification of expenditures. To accomplish this requirement, the District shall coordinate transaction reviews with grant managers and reconcile appropriate cost transfers within a reasonable timeframe. The District shall maintain source documentation supporting the expenditure of external grant funds, such as invoices, time sheets, payroll stubs or other appropriate documentation.

USE OF FUNDS

The District shall establish operating practices to ensure that external grant funds are expended as outlined in the grant award agreement, particularly with regard to allowable and unallowable costs. When required, the District shall seek prior written approval from the awarding agency before expending funds in restricted and/or scrutinized areas as outlined in the grant award agreement. The Chancellor or designee shall review and approve all transactions involving external grant funds and shall ensure the proper coding of expenditures consistent with the Budget and Accounting Manual.

TIME AND EFFORT REPORTING

The District shall establish operating practices to ensure that all District employees who are paid in full or in part with external grant funds, including employees whose salary is paid with non-grant funds but is used to meet a required match or in-kind contribution to an external grant program, document the amount of time they spend on grant activities.

SUBAWARD MONITORING

The District shall establish operating practices for the development and monitoring of subaward agreements that ensure compliance with external grant award requirements for subaward monitoring. At a minimum, the District shall ensure that subawardees comply with implementation requirements of the grant award agreement with regard to use of funds, time and effort reporting and other expenditure documentation, procurements requirements, prior approval mandates, and financial management standards.

AUDITS

The District shall establish operating practices to ensure compliance with state and federal audit requirements.

Specified records pertaining to the audit of federal funds expended by the District shall be transmitted to the clearinghouse designated by the federal Office of Management and Budget and shall be made available for public inspection. Such records shall be transmitted within 30 days after receipt of the auditor's report or within nine months after the end of the audit period, whichever is sooner, unless a longer period is agreed to in advance by the federal agency or a different period is specified in a program-specific audit guide. (2 Code of Federal Regulations 200.512)

In the event that the audit identifies any deficiency, the Chancellor or designee shall promptly act to either correct the identified deficiency, produce recommended improvements, or demonstrate that the audit finding is invalid or does not warrant action. (2 Code of Federal Regulations 200.26, 200.508, 200.511)

RECORDS RETENTION

The District shall establish operating practices to ensure compliance with external grant funding record retention requirements.

GRANT MANAGEMENT HANDBOOK

RCCD will develop, maintain, an up-to-date Grant Management Handbook that provides an overview of the operating practices outlined in AP 4011, reflects current effective grant management practices, aligns with District and state budget and accounting policies and practices, and offers guidance and support to grant managers with regard to District processes and procedures for grant implementation.

Office of Responsibility: Vice Chancellor, Institutional Advancement & Economic Development
Vice Chancellor, Business and Financial Services

Date Approved: November 14, 2016

Date Revised: August 28, 2018

Date Revised: December 14, 2021

Formerly: AP 4010[E] and 3285