



Grants Management & Compliance Handbook



Harper College

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Grants Management and Compliance Handbook

Congratulations! Your grant proposal has been selected for award and you are ready to begin implementation of the project.

This handbook provides a foundation for meeting basic grant management requirements and standards to help in effectively managing your grant. The handbook was created to increase project success, while minimizing any problems that may arise. As good stewards of grant resources, grantees are expected to understand and adhere to programmatic, administrative, and fiscal laws, regulations, policies, and procedures to most effectively implement and manage grant projects.

This guide outlines the steps to follow as grant projects are implemented and provides information related to working with the Grants Office, Budget Office, and other entities; ensuring audit readiness; requesting Institutional Review Board approval prior to conducting research at Harper, as applicable; and a variety of other pertinent topics. Remember, the Grants Office is here to support and ensure the success of your project.

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

- Will the project be on target to meet the required performance measures?
- Will all grant funds be expended during the grant period?
- Will the project records and documentation meet audit requirements?

Ensure that all project team members are familiar with the grant proposal, the notice of award, the terms of the grant agreement/contract, and Harper's policies and procedures. Being aware of what can and cannot be done, and how best to do it will alleviate potential difficulties in the future. For reference, the Grants Office includes essential grant-related information in the kick-off binder, which is distributed at the grant kick-off meeting.

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

Grants Office

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Section 1: Roles and Responsibilities for Grants Management and Administration

During the development, implementation, and management of projects, the primary offices that may be involved are: College President, Provost, Vice President of Advancement, the appropriate Dean, Budget Office, and the Grants Office. The primary individual responsible for coordinating with all of these offices is the Project Director. This individual is also responsible for facilitating communication about the project, soliciting support from the appropriate offices when needed, and participating in regularly scheduled grants compliance meetings with Grants Office staff. The President, or a designee in writing, is the only person who can commit the College to receive and use grant funds.

Grants Office

The Grants Office provides grant development and management services for externally funded grants for both the College (Institutional Grants) and the Harper College Educational Foundation (Educational Foundation Grants). For both types of grants, the Grants Office will support, guide, and advise faculty and staff through the full life cycle of grants from pre-award to post-award to closeout.

Pre-Award/Grant Development Responsibilities

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

Post-Award Grants Management and Compliance

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

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

Budget Office/ Financial Services for Grants

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

Grant Project Director and Department

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

1. Managing the budget
 - a. Responsible for reconciling quarterly budget reports in collaboration with the Grants Office and Budget Office.
 - b. Monitoring the budget monthly to compare percentage of time elapsed in grant period with the percentage of total funds spent to date.
2. Purchasing with grant funds
 - a. Ensuring purchasing requests adhere to College policies and procedures and to federal, state, or funder requirements.
 - b. Ensuring grant-funded positions are paid in accordance with the grant requirements and standard College payroll practices and processes and hired in accordance with College hiring practices.

3. Closing out the project and evaluation

- a. Preparing final reports for close out of the grant for submission to the funding agency, EC member, and Grants Office within 45 to 90 days after the project ends. (Reminder: Not completing and submitting reports timely may have an impact on our future funding.)
- b. Ensuring proper close out has been completed using the Grant Closeout Checklist.

Tip!

Pro Tip: The Grants Office and Budget Office are here to ensure your grant project is successful.

Section 2: Post- Award Processes and Procedures

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

Award Letter and Contract Processing

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

Tip!

Pro Tip: Copies of all award letters and contracts must be received by the Grants Office for inclusion in grant records and master files.

Negotiating the Award

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

Tip!

Pro Tip: Contact the Grants Office immediately if you are contacted by a funding agency program officer.

Executing the Grant Contract

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

The Grants Office will coordinate the review and approval of contract language. Upon approval of the contract language, the Grants Office will facilitate the signature process to fully execute the grant contract. The Grants Office will then distribute a copy of the fully executed grant contract and budget to the project director and grants accounting specialist for processing.

Announcing the Award

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

Grant Award Kick-Off Grant Meeting

Within two weeks of notice of award, the Grants Office will schedule a grant award kick-off meeting with the administrative, fiscal, and program staff who will be involved in the grant. This meeting is an opportunity for the project director and project team to ask questions and gain clarification on any and all aspects of project implementation.

Tip!

Pro Tip: Review the grant contract documents and grant proposal prior to the post-award meeting.

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

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

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

Appendix A includes Tips for Getting Started with Your Grant Project

Starting the Grant File

The official master grant file is maintained by Grants Office. This file should include all administrative documents associated with applying for, administration of, and closeout of the

grant contract as well as any documents necessary for recordkeeping and audit purposes. A duplicate working grant file should be maintained by the Project Director. For each new grant-funded project, an electronic and hard-copy file will be maintained that includes the following documentation:

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

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

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

Tip!

Pro Tip: Grant files are subject to audit and must be kept in proper order.

Section 3: Implementation of Grant Project

Applying Best Practices

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

Remember to:

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

Note: Progress and narrative reports are due to the Grants Office a minimum of five (5) days before the due date.

Tip!

Pro Tip: Use a monthly checklist to keep the project on track for success.

Establishing the Budget

Institutional Grants

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

Once the budget is established, the Grants Accounting Specialist will review the fiscal management process with the Project Director. The Project Director or support staff will need to request access to Oracle to manage and approve budget expenditures.

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

Note: If the Project Director should receive a check payable to the College directly from the funder, it should be immediately delivered to the Grants Accounting Specialist. Checks received in the name of the Educational Foundation should be forwarded to the Foundation for processing.

Educational Foundation Grants

If the grant was applied for using the Educational Foundation as the 501(c)(3) applicant, then you will follow procedures similar to the Institutional Grant process described above. The primary difference is that the Educational Foundation's Senior Director for Finance and Operations will setup the project budget and will review the fiscal management process with the Project Director.

Managing the Budget

Note that it is imperative that all grant funds are spent timely and prudently. Grant budget reports must be consistent with the project progress or narrative reports. If issues with project implementation arise that will impact the project budget, please contact the Grants Compliance Analyst and the Grants Accounting Specialist as soon as possible and well in advance of report due dates.

As the project progresses, communicate periodically with the Grants Accounting Specialist and Grants Compliance Analyst to:

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

Tip!

Pro Tip: Make sure all aspects of the budget and allowable expenses are understood.

Appendix B includes a Grant Award and Budget Management Checklist for use as the grant-funded project is implemented

Budge Line Items

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

Personnel (51xxxxx)

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

Benefits (52xxxxx)

Medical, dental, life insurance, and other fringe benefits related to faculty or staff working on grant programs. Professional development benefits are also included for personnel assigned to the grant fund. Federal award grants may include State University Retirements Benefits (SURS) based upon the current year state funding guidelines.

Travel & Meetings (55xxxxx)

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

Supplies (54xxxxx)

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

Equipment (58xxxxx)

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

Contractual Services (53xxxxx)

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

Other Expenses (59xxxxx)

Other expenses may include participant support costs such as tuition waivers, or scholarships. Most costs should fit into one of the above categories if they are being directly charged to the grant.

Please refer to Administrative Services Procedure manual for a full chart of accounts. <https://hip.harpercollege.edu/ourcollege/financialservices/Pages/default.aspx>

Expending Grant Funds

Allowable Expenditures

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

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

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

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

Approvals of Expenditures

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

Supplement vs. Supplant

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

Tip!

Pro Tip: Grant funds cannot be used to supplant other costs.

Documenting In-Kind, Cost Sharing and Matching

Some funding agencies or grant programs require the grantee institution to demonstrate its financial commitment to the project, or the commitment of other funding sources. This is done by sharing the total project costs through matching or leveraged funds, cost sharing, or in-kind contributions. If included in the grant proposal budget, these financial commitments become a binding requirement of the grant award and costs must be tracked and reported for compliance.

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

- Verifiable from the non-federal entity’s records;

- Not included as contributions for any other federal award;
- Necessary and reasonable for achieving project or program objectives;
- Not paid by the federal government, unless required; and ‘
- Included in the approved budget.

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

Accounting Services/Budget Office

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Grant Budget Revisions

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

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

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

Purchasing Department

The Purchasing Department has instituted an efficient and fair procurement process in accordance with federal and state procurement regulations and encourages the inclusion of all vendors and suppliers. The Purchasing Department serves the needs of the College for all purchases in excess of \$2,500 as outlined in the College’s Purchasing Policy. For purchases

of \$25,000 or more, a formal bid process is required. Responsibility and authority to make commitments for these purchases are assigned to the Purchasing Department. For more information on Purchasing procedures and processes, contact the Manager of Purchasing.

Purchasing Department

Jewell Jackson, Manager of Purchasing

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Vendors vs. Independent Contractors vs. Sub-recipients

Most vendors are businesses, suppliers, contractors, or subcontractors who sell goods and services to the College through the purchase requisition process. All vendors interested in doing business with the College must send a request on company letterhead asking to be added to the Bidder's List. Additional information can be found on the [Purchasing webpage](#). All vendors are subject to College purchasing policies.

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

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

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

Once the grant is awarded, the Project Director and the Director of Grants will discuss and determine which partners are eligible to receive federal assistance, and the Grants Office will prepare a sub-award agreement. This agreement will define the specifics of the grant work to be completed, the funding agency's terms and conditions, and College policies and

procedures. Sub-awards are written to assign specific portions of the programmatic effort and the sub-recipient is responsible for managing the technical and administrative aspects of the agreement.

Tip!

Pro Tip: Harper is required to monitor the costs and activities of sub-recipients.

The Project Director, Grants Accounting Specialist, and Grants Compliance Analyst will work closely to monitor whether:

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

Hiring Grant-Funded Personnel

Often, grant projects will include new positions. If new employees are to be hired for the project, the Project Director must follow the College's standard hiring process and procedures. Grant-funded personnel must be hired using the same procedures as non-grant personnel. For specific information regarding the College's policies and procedures involved in developing and posting a position, and guidance on the selection and hiring process, please consult with the appropriate human resources staff member.

When requesting new positions, the workforce approval process must be followed. Administrators must submit rationale for the new positions to the appropriate Executive Council member for approval. The EC member sends the new position and rationale to the Executive Assistant to the Chief Human Resources Officer for inclusion on the Workforce Request Report. If the President's Cabinet and the President approve the position, the workforce approval is sent to HR and the appropriate administrator and executive assistant.

For new positions, a job description must be created and sent to the Benefits and Compensation Manager for review and approval and to have a position classification and salary range assigned. The department is responsible for preparing the online Job Card via the PageUp People employment site. The HR Recruitment Office will finalize the Job card and post the position.

Human Resources

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Angela Bowling, Benefits & Compensation Manager

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Tracking Time and Effort

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

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

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

Tip!

Pro Tip: Contact the Grants Office or grants accounting specialist with questions about T&E reporting.

Risk, Compliance, and Sub-Award Management

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

The risk management cycle is a framework for continuous discovery, analysis, action, and improvement. Risk mitigation is taking appropriate action to address potential problems, including imposing the appropriate types and levels of requirements and providing appropriate types of monitoring and levels of technical assistance. Monitoring is the process followed to

assess how well a grant is being implemented, achieving program objectives, and complying with requirements, terms, and conditions.

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

- Assess the risk of subrecipients;
- Maintain strong internal controls for managing sub-awards;
- Communicate with federal program staff and with sub-recipients;
- Document all activities; and
- Monitor sub-awards to ensure sub-recipients are spending grant funds appropriately and in compliance with the award and all regulations.

When monitoring subrecipients, the pass-through entity must:

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

Programmatic Changes

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

Personnel Changes

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

Changes in Project Scope

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

No-cost Extension

A no-cost extension is a request to extend the end date of the project beyond the previously approved end date and for which no additional funds are needed beyond what was originally awarded. The Project Director is responsible for knowing the deadline for submitting a no-

cost extension request. Some programs do not allow no-cost extensions. Contact the Grants Office to discuss the justification for the no-cost extension. Simply having remaining funds at the end of the grant period is not sufficient justification for a no-cost extension.

Required Reporting

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

Tip!

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

Financial Reports

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

Narrative/Progress Reports

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

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

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

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

Follow all instructions

- Adhere to page limits, use funder formatting
- Ensure the specific questions of the funder are being answered

Review grant agreement guidelines

- Ensure each goal, objective, and activity is addressed

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

- Include any corrective action taken to get back on track

Be clear, concise, and coherent

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

Compliance Reviews

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

Appendix C includes a Compliance and File Review Checklist used in monthly compliance review meetings

The Grants Office will schedule monthly or quarterly compliance reviews with project directors to review progress, both programmatically and financially, and discuss any issues or answer any questions. The frequency of these meetings will be determined based on the complexity of the grant and the grant management experience of the Project Director. These meetings allow the Grants Office to support project directors in successfully managing their grant projects.

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

Institutional Reporting

The Grants Office provides monthly and annual reports to the College President, Vice President of Advancement, Board of Trustees, and Board of Directors. This report includes all current fiscal year grant awards, proposals pending, and proposals in development.

Section 4: Project Evaluation

Preparing for Project Evaluation

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

Programmatic assessment addresses the following questions:

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

Administrative assessment addresses the following types of questions:

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

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

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

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

- 1) **Know the expectations of the project.** Review goals, objectives, strategies, milestones, deliverables, outcomes and work plans. Scrutinize the performance measures and indicators and carefully plan the tools and resources that will be used for collecting and storing data, when data collection will occur, and how the data will be analyzed.
- 2) **Seek Institutional Review Board (IRB) approval, when required.** Review the next section of this handbook and work with the Office of Institutional Research (OIR) to determine if IRB approval is necessary for the project.

- 3) **Contact the OIR to discuss the evaluation plans.** Project directors must work with OIR regardless of whether the evaluation is conducted internally or externally by a third party. OIR can advise on baselines, data collection tools and databases, and plans for analyzing data.
- 4) **Hire an external evaluator, if applicable.** If an external evaluator was proposed, contact the purchasing department to initiate the bidding process. External evaluators must work with OIR in collecting data and evaluating the project.
- 5) **Establish a sequence for conducting evaluation activities.** Activities may include complete baseline documentation, conduct pre-tests or surveys, conduct post-tests, and follow-up with participants and partners.
- 6) **Finalize data collection methods.** Determine what data is needed to show progress toward objectives using performance indicators; plan to collect qualitative and quantitative data from existing or new sources; identify how and where data will be entered and safely stored; and create plans to periodically pull and analyze data for reports and ongoing project improvement.
- 7) **Engage stakeholders.** If the proposed evaluation plan included input from a stakeholder group or steering committee, now is the time to formally establish the group and begin communication. Create opportunities for partners and stakeholders to engage in the evaluation process as well as identify solutions to the findings. Create a feedback loop throughout the process for interim findings and recommendations.
- 8) **Initiate data collection.** Begin to systematically gather and enter data into a secure database.
- 9) **Analyze the data.** Prepare and implement plans to analyze data for reports and continuous improvement, including sharing results with stakeholders and partners. Compile data and prepare reports. This step involves the external evaluator, if applicable.
- 10) **Monitor the budget.** Review budget expenditures and modifications; ensure that financial reports are submitted on time; and review the program's A-133 audits, as applicable.
- 11) **Develop plan for disseminating results.** Document and disseminate the results and lessons learned via customized communications that meet the specific needs of stakeholder groups. Findings should be considered in decisions or actions that affect the project. Schedule follow-up meetings with report users to make sure the findings are communicated and used appropriately in decision making.

Section 5: Grant Closeout

Grant closeout is the process by which the Project Director, Dean, Budget Office, and Grants Office determine that all requirements of the grant contract agreement between the funding agency and the College have been completed in accordance with the terms and conditions of the agreement. Finishing a grant project is just as important as starting one. Closing out a grant project involves making sure that all grant contract activities have been completed and funding has been exhausted.

Closeout of the grant does not cancel any requirements for property accountability, record retention, or financial accountability. Following closeout, the College remains obligated to return any unexpended funds due to the agency and the sponsor/funding agency may recover amounts based on the results of an audit covering any part of the grant period.

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

Appendix D contains the Grant Project Pre-Closeout and Closeout Checklists to assist you with preparing for the close out of your grant

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

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

Area	Process
Pre-Closeout Meeting	Grants Office will contact the Project Director to schedule a pre-closeout meeting at least two months prior to the end of the grant.
Budget	Review encumbrances and liquidate those no longer needed. Accounts will be closed soon after the grant's ending date.
Personnel	Complete termination paperwork for all grant-funded staff and if required, submit payroll changes for staff members transferred to other budget accounts or to the new grant budget account assigned to a continuing grant.

Purchasing	Ensure all goods and services have been received prior to the end of the grant, although payment can occur soon after the end of the grant period.
Grant Files	Review all grant documents, personnel records, purchase orders and requisitions, and budget records.
Final Reports	Follow guidelines covered in this section of the handbook.
Document Storage	Plan to have all grant files transferred to the Grants Office for storage. See Records Management guidelines below.

Disposition of Equipment

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

Final Reporting

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

Records Management

The College adheres to Federal rules pertaining to retention requirements for grant agreements. As a general rule, all grant files must be retained for a period of at least three (3) years. More specifically, 2 CFR 200.333 states the following:

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:

(a) 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.

(b) 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.

(c) Records for real property and equipment acquired with Federal funds must be retained for 3 years after final disposition.

(d) 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.

(e) 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.

(f) 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).

(1) 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.

(2) 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.

Tip!

Pro Tip: Grant records must be maintained for three years after final financial report is submitted.

Section 6: Compliance, Audits, and Audit Readiness

Compliance

Grant compliance is the cornerstone of grants management.

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

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

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

Audit Readiness

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

- ✓ **Administrative controls:** Internal policies and procedures an organization follows as part of its normal business operations.
- ✓ **Accounting controls:** Internal policies and procedures that protect an organization's finances and financial records.
- ✓ **Compliance with Federal, state, and grant program requirements:** Adherence to laws and regulations related to reporting of financial status, treatment of grant-related income, eligibility of participants, monitoring of activities, allowability of charges, and direct and indirect cost allocations.
- ✓ **Records:** Should include information adequate to support statements in the proposal and should be retained for the required period of time. The Grants Office will review your project records during annual file reviews.

- ✓ **Internal audits:** May be requested by the funding agency to assist in determining the adequacy of controls and systems.

Common Audit Findings

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

Common Budget-Related Audit Findings	
<ul style="list-style-type: none"> - Unallowable costs charged to grant - Inaccurate administrative costs - Misallocation of costs (amounts expended in unapproved cost category or other cost category) - Budget adjusted without prior written approval - Excessive cost transfers/journal entries 	<ul style="list-style-type: none"> - Lack of time documentation to support salaries charged to grant budget - Inaccurate time and effort reporting or inadequate documentation - Lack of consulting agreements and invoices to support services were related to grant and costs were reasonable
Common Match, In-Kind, Cost Sharing Audit Findings	
<ul style="list-style-type: none"> - Cash and in-kind amounts not supported by adequate documentation or not verifiable - Using other federal funds as match - Costs charged based on estimated amounts rather than actual costs - Match claimed on Federal Financial Report (FFR) based on estimates, not actual amounts 	<ul style="list-style-type: none"> - Match expense incurred outside of grant award period - Match amounts unreasonable or excessive - Match deemed unnecessary to implement grant - Match claimed that was not in the approved grant budget
Other Common Audit Findings	
<ul style="list-style-type: none"> - Noncompliance with assurances and special terms and conditions of award - Significantly behind schedule in meeting grant deliverables or outcomes - Missing or inadequate support documentation for purchases - Equipment purchased without program officer approval 	<ul style="list-style-type: none"> - Changes made to scope of work without program officer approval - Delinquent financial and progress reports - Delinquent closeout report - Inadequate or no subrecipient monitoring - Missing acknowledgement of funding agency on project materials

Appendix E includes Tips for Successful Grant Compliance and Project Management.

Section 7: Additional Information

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

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

Seeking Institutional Review Board Approval

The College's IRB is responsible for ensuring that data derived from, or to be derived from, human subjects affiliated with Harper College is collected and used in a manner that complies with the Code of Federal Regulations (45 CFR part 46) and the U.S. Food and Drug Administration (21 CFR parts 50 and 56). In fulfilling its mission, the IRB must carefully examine research proposals to arrive at an independent determination that the research or data collected and used will meet the following criteria:

- Risks to subjects are minimized and 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 and is properly documented.
- When appropriate, the research plan makes adequate provisions for monitoring data collected to ensure the safety of subjects.
- When appropriate, there are adequate provisions to protect the privacy of subjects and to maintain confidentiality of data.
- Additional safeguards are implemented to ensure members of vulnerable populations are not the subject of coercion or undue influence.

Tip!

Pro Tip: Visit the [IRB webpage](#) for the IRB Manual, Forms, and FAQs.

Prior to commencing any type of human subject research or confidential data collection (i.e., involving students, staff, or faculty) as part of the project evaluation activities, completion, submission, and approval of a Research Proposal Form is mandatory. The form and instructions can be found on the College's website at <https://www.harpercollege.edu/leadership/irb/index.php>.

If there are questions or concerns about whether the research or evaluation plan requires IRB approval, please contact OIR to discuss the plans.

Office of Institutional Research

Kathy Coy, Director of Institutional Research and Chair, Institutional Review Board

Phone: (847) 925-6955

Email: kcoy@harpercollege.edu

Conflict of Interest

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

Disseminating Project Results

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

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

Section 8: Grants Terminology and Acronyms

501(c)3: Section of the IRS Code that authorizes and defines most tax-exempt organizations, which must be organized and operated for a public purpose. 501(c)3 is the most common type of non-profit designation. The Harper College Educational Foundation is designated as a 501(c)3 and has tax-exempt status.

Activities (developmental vs. operational): developmental activities are those that use innovative approaches to solve an institutional problem. Operational activities are those that are performed in the course of normal everyday college business.

Administrative Fees/Overhead: Portion of a grant or contract that may be used for non-programmatic costs, sometimes unallowable or with limits set by the funder as a percentage of the total grant. (See also Indirect Costs).

Allowable Cost: A cost for which an institution or agency may be reimbursed under a grant or contract with a government agency.

Amendment: Modification of an existing grant or contract agreement. Must be in writing.

Appropriations: Federal or State congressional legislation that approves spending for a particular agency or group of agencies.

Audit: Detailed financial analysis performed by an independent accounting firm at the end of the institution's fiscal year. Can also be conducted by a federal or state funding agency at the end of a grant project period. Program audits are also sometimes required by the funder to ensure outcomes were achieved and money was spent in accordance with the grant agreement.

Authorized Organizational Representative (AOR): Member of organization authorized to submit applications in Grants.gov on behalf of the organization.

Award: Financial assistance that provides support or stimulation to accomplish the program or public purpose.

Award Letter: Written notification from the funding agency indicating that a project has been funded.

Best Practices: Theories and activities within a given field that have been demonstrated to be successful in addressing issues or needs in the field. These programs, processes, or services have been tested and can be replicated.

Block Grants: Funds distributed by the federal government to state and local governments for broad purposes allocated based on population (e.g., community development block grants).

Boilerplate Language: Standard narratives about an organization, program, or service that is kept on file to be easily pasted into a proposal or grant application with only minor modification/adaptation needed.

Budget: Fiscal plan for entire organization, specific program, or specific project that includes an itemized list of projected revenues (income) and expenses. Generally created on an annual basis for organizations and for the entire project period for a grant.

Budget Modification: Formal change in the allocation of grant funding when a deviation from the grant budget approved by the funder is needed. Any deviation from the approved grant budget requires formal approval from the funder. The percentage of allowed deviation is generally stated in the grant agreement.

Budget Narrative: Detailed description of each line item included in the proposed grant budget. Describes how the amount was calculated and how it supports the program. All budget items should support the activities described in the scope of work.

Cage Code: Five-character code which identifies companies doing business with the federal government and is assigned through SAM.

Capacity: The organization's ability to effectively manage a grant, to have the requisite resources and institutional support, and to ensure that the program is implemented successfully. This can include grant management experience, subject matter expertise, staffing, fiscal systems, space, equipment, and other assets needed to support the grant.

Capital Funding: Grant or donation to assist in construction or renovation of building(s) or space(s) in a building, or the acquisition of equipment (valued at \$10,000 or more with a life span greater than one year).

Catalog of Federal Domestic Assistance (CFDA): Resource listing all new, existing, and past federal programs. Each federal grant has an CFDA number assigned to it and is required on the Standard Form 424, the cover sheet for federal proposals.

Challenge Grant: Grant offered by a funder to encourage other grant makers or individuals to support a particular program. These funds are only received if the other funds are obtained.

Community-based Organization: Non-profit groups that work at the local level to improve life for the residents.

Community Foundation: Foundation established for the purpose of managing funds for the benefit of a community in which it functions. Examples: Barrington Area Community Foundation and Chicago Community Trust.

Competitive Grant: Grant award by a government agency or private funder through a competitive application process. Proposals or applications are submitted in response to a Request for Proposals (RFP) or a Notice of Funding Opportunity (NOFO) and are scored according to established evaluation criteria.

Conflict of Interest: When two or more contradictory interests relate to an activity by an individual or organization. Situations in which financial or other personal considerations may compromise or have the appearance of comprising an individual's judgement in conducting work or research.

Corporate Foundation: Foundation that is separate and independent of a company established solely for charitable purposes. Maintains close ties with the parent company and giving usually reflects the company's interests.

Cost Sharing/Matching: Portion of project costs not paid by federal funds. Can be value of allowable third-party in-kind contributions or expenditures of awardee.

Demonstration Project/Grant: Project designed and funded to determine the viability of a new idea, program, or service. Can test and measure the effects of new programs or program changes in a real-world environment.

Determination Letter: Letter from the IRS affirming that an organization is eligible for tax-exempt status. The Harper College Educational Foundation is designated as a 501(c)3 and has tax-exempt status.

Direct Costs: All budget items that directly support the work of the project and are allowable and allocable in accordance with the grant agreement and approved budget.

Discretionary Grants: Funds awarded on the basis of a competitive process. Awardee is selected based on merit and eligibility.

DUNS Number: Data Universal Numbering System number assigned by Dun & Bradstreet to every organization that applies for a grant. Required for all federal grant applications.

Eligibility Guidelines: Requirements the applicant must meet as defined by the funder in order to be eligible to apply for a specific grant.

Employer Identification Number (EIN): Unique identification number assigned by the IRS to a business entity. Also known as a Tax Identification Number (TIN). The Foundation and the College each have unique EINs.

Evaluation Plan: An integral part of a proposal that describes a systematic process for gathering, analyzing, and reporting information about a program. A detailed plan for measuring a project's or program's effectiveness and impact on participants.

Family Foundation: An independent foundation whose funds are derived from members of a single family (although this is not a legal term).

Federal Register: Federal government publication in which grant announcements (NOFAs, FOAs, RFAs, RFPs, or SGAs), rules and regulations, and other notices are published.

Fiscal Year (FY): 12-month period of operation of an organization under its annual budget. The Foundation and the College have fiscal years running from July 1 to June 30 each year and the federal government's is October 1 to September 30. Fiscal year is designated by the year in which the fiscal year ends.

Form 990: IRS form entitled Return of Organization Exempt from Income Tax which must be filed annually by tax exempt organizations. Provides overview of organization's activities, governance, and detailed financial information.

Formula Grants: Federal government funding provided to states and major municipalities based on a formula that accounts for number of individuals entitled to that funding. Could be based on total population or individuals in a specific category such as elderly, disabled, youth, etc.

General Operating Funds: Funding for the organization as a whole for any purpose that furthers the mission of the organization. Funding for costs that cannot be allocated to a specific project or program. Also called unrestricted funds or administrative overhead.

Governmental Institution: Designation given to an institution acting as an instrumentality of a governmental unit. Harper College is considered a governmental institution.

Grant: Award of money, or sometimes goods or services, to accomplish a specific purpose defined by the funder to be carried out by the grantee.

Grant Accountability and Transparency Act (GATA): Statewide initiative to establish a compliant, uniform framework for grant management in Illinois.

Grant Project Administrator: Project director identified by the College to manage a grant in accordance with the grant agreement.

Grant Agreement: Legally binding document that states funder's requirements, terms, and conditions. Once signed by both parties, the funder and the College are legally bound to those legal terms and conditions. Changes to these term and conditions must be written.

GAN: Grant Agreement Number

Grant Guidelines: Funder's official instructions for applying for a grant laid out in the forms of NOFAs, FOAs, RFAs, RFPs, or SGAs. Details components of grant proposal or application that must be included to be considered responsive and viable.

Grant maker: Entity that provides grants. Can include government agencies, foundations, associations, and corporations.

Grants.gov: A common website for federal agencies to post discretionary funding opportunities and for grantees to find and apply for them.

IBHE: Illinois Board of Higher Education

ICCB: Illinois Community College Board

ICCSF: Illinois Community College Scholarship Foundation

Impact Statement: Demonstrates how the work will make a difference in the lives of people and communities.

Indirect Costs: Costs that are incurred for common or joint objectives and cannot be readily identified with a particular final cost objective. The College has a negotiated indirect cost rate agreement (NICRA) approved by our cognizant agency. Many funders limit the Percentage of total program costs allowable to pay for overhead. (See also Administrative Overhead)

In-kind Contribution: Goods or services that are donated to an organization in support of a project or program. In-kind contributions should be identified in the budget as in-kind and described in the budget narrative. In-kind can be used as matching funds in some cases.

Institutionalization: Permanent or long-term support for or absorption of a specific program or service by the institution in order to sustain it after the grant funding has ended.

IHE: Institutions of Higher Education

Key Staff/Personnel: Administrators, faculty, and/or staff who are critical to implementation and management of a specific project/grant. Contribute to the execution of a project in a substantive, measurable way, regardless if they are directly funded by the grant. Any change in key personnel named in the grant agreement should be communicated to the funder immediately.

Kickoff Meeting: First meeting of the grant project team (and sometimes the funder) to have an open discussion regarding the details of the grant and project. Grants director will answer any questions regarding processes or procedures, discuss budget and reporting requirements, and ensure all roles and responsibilities are defined and understood.

Letter of Intent (LOI): Preliminary, non-binding indication of an organization's intent to submit an application or proposal.

Letter of Inquiry (LOI): Proposal letter to introduce your organization, project idea, and proposed budget in an effort to get an invitation to submit a full proposal.

Letters of Support: Letters included in a grant proposal describing the support of the project from legislators or external organizations (e.g., local industry, community organizations, other colleges or universities, small businesses).

Match (or Matching Funds): Amount or percentage of total budget that a funder may require an applicant to commit to the program, if funded. Match can be in-kind contributions, case, or a combination of both.

Memorandum of Understanding (MOU): Agreement signed by authorized representatives of each organization or from each partner of a project that specifies the activities and services that each organization will perform and the expectations/responsibilities that each organization has from the grant project. Also can be a Memorandum of Agreement (MOA).

Needs Assessment: Systematic process for gathering qualitative and/or quantitative data and documentation used to identify needs, gaps, and solutions to get an organization from a state of "what is" to a state of "what should be." There are a variety of needs assessments conducted at the College, including Capacity Needs Assessments, Program Needs Assessments, and Student Needs Assessments.

Needs Statement (Problem Statement): Section of a grant proposal that defines the issues, needs, or problems, that a program will address. Proposals to government agencies generally require greater documentation and data to document the problem. Includes research from the field.

Non-federal Entity: State, local government, Indian tribe, institution of high education (IHE), or nonprofit organization that carries out a Federal award as a recipient or subrecipient.

Notice of Funding Availability (NOFA): Formal, published announcement made by a funder (generally a government agency) of a funding opportunity for a specific program identified in the NOFA. Also called a Notice of Funding Opportunity (NOFO), Request for Proposals (RFP), or Request for Application (ROA).

Objectives: Clearly defined and measurable results (outcomes) that a project or program is expected to achieve.

Outcomes: Intended, measurable results of a project or program.

Outcome Evaluation: Process of determining whether and to what extent a project or program achieved its results. Generally accomplished through quantitative research methods. Sometimes requires an external evaluator. Also called Summative Evaluation.

Pass-through Entity: Non-federal entity that provides a subaward to a subrecipient to carry out part of a Federal grant program.

Process Evaluation: Application of research methods, generally qualitative, to determine if a program was implemented the way it was intended to be implemented. Provides feedback to program managers to take corrective action. Also called Formative Evaluation.

Program Evaluation: Systematic process for analyzing indicators and documenting whether or not a program has achieved its objectives or intended outcomes. Complexity is dependent on funder's requirements.

Program Officer (Grants Officer): Staff member of funding organization who receives grant proposals and processes applications for a government agency or foundation.

Project Period (Performance Period): Length of time of the grant-funded project approved by the funder.

Request for Proposal (RFP): Document issued by funding agency inviting eligible organizations to submit a proposal for a specific funding opportunity. Seen more in federal contracts than federal grants. Also called Request for Application (RFA), Request for Quote (RFQ), or a Solicitation.

SAM Cage Code: Five-character ID number used extensively within the Federal government. It is assigned to identify a given legal entity at a specific location.

Seed Grant: Grant funds used to start a new project or program.

Site Visit: On-campus visit by a funding agency that is considering the College for a grant which allows the agency to assess the information contained in the proposal and to ask additional questions to determine capability of the College to perform the work of the grant.

Subrecipient: Non-federal entity that receives a subaward from a pass-through entity to carry out a part of a Federal program, but does not include an individual that is a beneficiary of such program.

Supplanting: Using grant funds to pay for ongoing activities already budgeted for or for the usual activities assigned to a position. Supplanting is not allowed.

System for Award Management (SAM): Federal government database that validates applicant information and electronically shares the secure and encrypted data with federal agencies' finance office to facilitate paperless payments through EFT. Stores organizational information allowing Grants.gov to verify organizational identity and to pre-fill organizational information on grant applications.

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Appendix A: Tips for Getting Started with Your Grant Project

1. Review the Grant Proposal

In the euphoria of receiving a grant award, staff members can forget to review the grant proposal to refresh their memory on the specifics laid out in the narrative and this can lead to difficulties. It is not unusual for three to nine months to pass between submission of a proposal and notification of an award.

If the grant is from a federal government agency, be sure to study that agency's rules and regulations regarding grants. The Project Director should also become familiar with the Office of Management and Budget (OMB) Circular that specifies the administrative rules regarding grants to an institution of higher education. If the agency does not provide a grants management document or booklet, the Grants Office will ask if they have one that they can provide. The OMB Circular can be found at <https://www.whitehouse.gov/omb/information-for-agencies/circulars/#educational>.

2. Understand Financial Management

Purchasing requests for equipment must follow College and/or funder guidelines (whichever is more stringent) and be submitted to the appropriate supervisor for approval. If there are any questions or concerns about the expense, the request should be forwarded to the Grants Compliance Analyst for review to ensure it is allowable. Purchases of supplies and services must be submitted to the appropriate supervisor for approval prior to spending grant funds.

The notice of funding opportunity (NOFO, RFP, FOA, etc.), the grant proposal, the Grants Office, the Budget Office, and the Grants Manual provide extensive information on how to implement and manage a grant-funded project. The terms and conditions of the grant contain the specific laws, regulations, and requirements that must be followed in the implementation, management, and close out of the grant.

A few of the most basic, most critical rules include:

- Only expend funds as laid out in the approved grant budget.
- Never use funds from a grant for items not included in the grant budget or for purposes other than described in the grant narrative.
- If the original budget requires changes in order to fully support the purpose of the grant, contact the Grants Office to coordinate the modification request before making any changes or spending outside of the approved budget.
- Support every expense with adequate documentation.
- Use a system of checks and balances so that no one person is solely in charge of the funds.
- Keep receipts, documentation, and monthly budget reports well organized and accessible.

- Monitor grant expenditures monthly to ensure that over-spending or under-spending can be addressed before the end of the grant period.

3. Schedule Financial and Progress Reports

Almost all grants require financial and program progress reports to be submitted according to a schedule. With the hectic work pace that often accompanies receipt of a grant award, it is critical to establish a system for recording when reports are due and then reminding responsible staff of upcoming deadlines. If project staff wait until the last minute or let due dates pass, it's not possible to do a high-quality job and poor or late reporting will damage the College's credibility and reputation with the funder.

Even if a funder does not require reports, the College will submit them. Transparency and keeping funders abreast of project progress is good business practice, enhances the College's credibility, and helps to build and maintain a solid relationship with the funder. Work with the Grants Compliance Analyst to set up a reporting calendar. Intervals of six and twelve month points should be the minimum, quarterly is preferred. Unless a funder specifies otherwise, all reports should include:

- **Financial Overview:** Explain the grant's budget status including program income, expenditures by cost category, and funds remaining
- **Program Implementation:** Update the funder on what activities were originally planned and what has been accomplished to date
- **Program Outcomes:** The best evaluation plans measure program results as the grant work progresses, rather than at the end of the grant period. Provide the funder with information on evaluation activities and the degree to which the program is producing the expected outcomes.
- **Change of Plans:** If a change to the planned approach is needed to achieve the best outcomes, explain the change needed and why it is needed. If the change impacts the scope of work or budget, contact the Grants Office to discuss and initiate a formal grant modification.
- **Challenges, Successes, and Lessons:** If during the course of the grant there have been specific challenges in implementation, or if it has had great successes in some area, be sure to let the funder know. If there are lessons learned that will inform the future work of this project or the College, that should be explained as well.
- **Attachments:** Attaching pictures, news releases, letters from beneficiaries of the program, or other relevant information can bring the report alive and engage the funder more deeply. This should not be overdone, and don't do it at all if the funder requested not to receive attachments. The Grants Office can help with determining the protocol.

Outlook, other electronic calendars, and/or Microsoft Teams can be used to schedule reports and remind staff members of deadlines. A master reporting calendar will be established and will be provided to the Project Director during the grant kick-off meeting. Reporting schedules will also be monitored and tracked by the Grants Compliance Analyst.

4. Involve Your Partners

When the grant-funded project includes partnerships with other organizations, it is critical to make a strong start together and avoid misunderstandings. To accomplish that:

- Immediately inform partner organizations that the grant proposal has been funded.
- Provide partners with a copy of the grant proposal, or at least the portion of the proposal that pertains to their involvement and responsibilities for program implementation.
- If grant funds will be allocated to other organizations, the Grants Office will draft the subrecipient agreement(s) detailing the prime grantee and subrecipient relationships. Drafts will be provided to partners for review, negotiation, and execution. Agreement will be specific for each partner organization. At a minimum each should include:
 - The amount of funds to be paid and the payment schedule (funds should be provided incrementally as payment for receipt of accepted deliverables);
 - Reports required and deadlines;
 - Services to be delivered and timeline for deliverables;
 - Consequences of non-compliance with sub-recipient agreements; and
 - Any flow-down clauses required by the grant.
- Hold a meeting of partners to celebrate the grant award, review each organization's role, acknowledge reporting and deliverable deadlines, and finalize start-up plans. Be sure the discussions are recorded.

5. Grant Award Announcements

A grant award increases the College's capacity to serve the community and shows that funders are willing to invest in its work. Some funders request that their grant contributions be announced to the public, but even when they don't, unless it is restricted in the grant, it is good practice to do so. It is important to let the community know the exciting and innovative work being done at the College, and is also a chance to highlight the College's commitment its mission and to publicly thank the funder for the support.

Appendix B: Grant Award and Budget Management Checklist

Award and Grant Contract Processing

- Inform the Grants Office of your grant award. Forward a copy of the award notification to the Director of Grants and keep a copy for your files.
- Carefully review the grant proposal and award notification. The Grants Office will verify the award amount, the budget breakdown, timelines, and reporting requirements.
- Work with the Grants Office to negotiate the budget and/or project details with the program officer.
- Work with the Grants Office to coordinate the signature process to fully execute the grant contract. The Grants Office will obtain signatures and forward a copy of the signed contract to you.
- Review the funding agency's policy on publicity. Work with the Grants Office to coordinate and discuss a press release and requirements for project materials. Funding agency often must be acknowledged and may have included specific language in the grant contract to use.
- The Grants Office will prepare and submit a brief abstract of each awarded grant for inclusion in the President's Report.
- Work with the Grants Office to start a grant file to include the following:
 - Original Request for Proposal (RFP)/Notice of Funding Opportunity (NOFO)
 - Program guidelines
 - Original proposal/application submission documents
 - Final proposal and budget, if amended
 - Original award documents (fully executed) and any amendments or approvals
 - Fully-executed grant contract
 - MOUs with any external partners
 - Indirect Cost Rate Agreement (ICRA)
 - Documentation of in-kind, matching, and cost-sharing commitments in approved budget
 - Project timeline/work plan from original proposal
 - Grant correspondence with funding agency
 - Participant files
 - Sub-grantee monitoring reports and other records
 - Program audit reports

- Program monitoring and evaluation reports
 - Progress and Financial Reports
 - Closeout documentation
- Make a note of important deadlines and set up a process to track deliverables, including:
 - Interim and final progress/narrative reports
 - Interim and final financial reports
 - Deadlines for requesting SOW or budget modifications
 - Deadline for requesting no-cost extensions
 - Contact Human Resources to initiate the process for hiring grant-funded personnel.
 - Review the proposed evaluation plan and implement routine data collection activities. Contact IR for assistance, as needed.
 - File the IRB paperwork if the evaluation activity involves human subject research.

Budget Processing

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

Appendix C: Compliance and File Review Checklist

Project Information

Date: _____ Dates Covered: _____

Project Title: _____

Award Amount: _____

Project Director: _____

Project Staff: _____

Administrative Files Checklist

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

Evaluation Files

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

Grant Project Status

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

_____ **Yes** _____ **No**

If no, please explain.

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

If no, please explain.

3. Are all procedures related to grant management being followed and documented?

___ Yes ___ No

(See Grants Management & Compliance Handbook)

If no, please explain.

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

___ Yes ___ No

If no, please explain.

5. Is budget being expended in accordance with the grant contract, program requirements, regulations, and proposed budget? ___ Yes ___ No

If no, please explain.

6. Is the project fully staffed as outlined in the proposal? ___ Yes ___ No

If no, please explain.

7. Are data collection, storage, and analysis systems in place to support reporting?

___ Yes ___ No

If no, please explain.

8. Are the performance objectives and outcomes being met? ___ Yes ___ No

If no, please explain.

9. Have any significant accomplishments or challenges been identified? ___ Yes

___ No

If yes, please explain.

Summary of the Review

1. Is technical assistance needed? ___ Yes ___ No

If yes, please explain.

2. Are corrective actions recommended? _____ Yes _____ No

If yes, please explain.

Additional comments or concerns discussed during the review:

Appendix D: Grant Pre-Closeout and Closeout Checklists

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

Grant Pre-Closeout Checklist

Pre-Closeout (6 months prior to closeout)

- If you do not anticipate that the project will be completed on time, determine if no-cost extension is appropriate and allowed. Contact the Grants Office for technical assistance if no-cost extension is to be requested.
- Contact the grant accounting specialist to review all expenditures, encumbrances, and projected final expenses.

Note: Please keep in mind that all materials and supplies needed for project completion should be purchased at least 30 days prior to the grant period end date, and that all equipment needed for project completion should be purchased at least 60 days prior to the grant period end date. Do not make mass or unusual purchases at the end of a grant period.

- Be sure to schedule the preparation and completion of the final narrative and financial reports in accordance with the grant contract.

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

- Two months prior to closeout:
 - Clear out all open encumbrances from your grant budget. Discuss any pending items with the grant accounting specialist.
 - Ensure all subrecipient invoices have been paid, if applicable. Review the status of any outstanding invoices, final invoices, and confirm all payments have been made with the grant accounting specialist.
 - Confirm that all interim and final reports and deliverables from subrecipients or consultants have been received and processed.
 - Finalize all equipment purchases and make plans for final purchases needed for your grant project.
 - Follow-up on any open purchase orders and requisition requests to make sure timely receipt of goods and services and invoices from vendors.

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

- One month prior to closeout:
 - Work with grant accounting specialist to reconcile line items and process any adjustments.

- Ensure all institutional match (cash, in-kind, etc.) documentation is submitted to the grant accounting specialist.
- Inventory all grant equipment and supplies to be sure they are accounted for and on campus.

Personnel

- Two months prior to closeout, notify Human Resources of the end date for grant-funded positions.
- One month prior to closeout, ensure all Time and Effort Certification Forms have been completed and certified and staff have been paid.

Grant Files

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

Final Reporting

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

Grant Project Closeout Checklist

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

1. Project budget cost categories at the end of the grant period should show a zero balance.

- a. If there are funds remaining at the end of the grant period, please explain the reason for the unexpended funds.

- b. If there was any overspending in a cost category/budget line, please provide an explanation for the variance.

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

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

3. Meet with Grants Office to finalize closeout.

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

Signature: _____ **Date:** _____
Project Director

Signature: _____ **Date:** _____
Grants Office Staff

Appendix E: Tips for Successful Grant Compliance and Project Management

The following guidelines provide recommendations for successful grants management and administration.

Get Off to a Positive Start

A grant kick-off meeting will be scheduled with all relevant parties within two weeks of award notification. The first weeks and months of a grant can be overwhelming, but they are critical to the long-term success of the grant as well. Much of the paperwork is completed during this time – the budget is activated; timelines, objectives, and deliverables are adjusted; and personnel are hired. Delays in start-up activities can cause problems throughout the life of the grant and can also have a negative impact on the completion of the grant objectives. During the start-up phase of your grant be sure to:

- a. Enter all important dates (deliverables, meetings, reports, etc.) into the Teams site and/or your Outlook calendar.
- b. Attend kick-off meeting with Grants Office and grant accounting specialist.

Get the Letter of Award

The letter of award (also known as a Notice of Grant Award or Notice of State Award) is received after negotiations have been completed and the budget is approved and indicates that the College has been selected for award. The letter contains the assigned grant number, total dollar amount awarded, and the duration of the grant period, and is usually sent to the College president. The letter of award is generally followed by a formal grant agreement/contract and incorporates the College's proposal, including budget, as the statement of work.

Ask Questions

As a new grant project director, there is a lot of information that can be overwhelming to both new project directors and those more experienced with grants. Each funding agency is different and each grant is different. This manual is a resource for project directors, and the Grants Office is available to answer grant-related questions at any time. Also, if a plan of action or an expense causes hesitation, please ask the Grants Office for guidance or clarification. Impropriety can be extremely costly – personally, professionally, and financially. Proper management of the grant is critical, not just for the success of this grant, but also the College's ability to apply for additional grants. The Grants Office is available to assist throughout the lifecycle of the grant.

Make Time to Manage

Block time on your schedule to focus on grant management activities. Depending on the size and complexity of the grant, this may require two to four hours per week. Be sure to refresh your memory by reading through your proposal, grant agreement, and work plan periodically. Review your grant budget and expenditures. Review your deliverables and reporting schedules. Attend your monthly compliance review meetings with the Grants Office.

Keep Lines of Communication Open

Read your email and follow up on meetings with a written memo. Academic communities and funding agencies communicate in writing. Paper and email trails protect the grant, the College, and grant administrators from misunderstanding messages being communicated. Copy your supervisor and the Grants Office on all email correspondence and keep electronic and/or hard copies of all documents and correspondence pertaining to your grant in the grant file.

Acknowledge the Funding Agency

Most grants specifically state how the funding agency/grantor wants (or does not want) to be recognized publically. On all printed and electronic materials, whether a press release, brochure, flyer, or training materials, acknowledgement and attribution should be made to the funding agency in accordance with the grant agreement. Most funding agencies require a disclaimer for any printed or electronic materials funded by grants. A sample of all printed and electronic materials funded by grants should be submitted to the Grants Office prior to finalizing to ensure compliance with funding agency requirements. Credit should also be given to the funding agency when presenting orally. Work with the Grants Office to ensure that specific funding agency guidelines related to publicity and acknowledgement are followed.

Provide Sufficient Lead Time

Your grant project is one of many projects impacting College resources, programs, and services. Work is accomplished more effectively and efficiently when sufficient lead time is provided. Grants often have unique requirements and activities that are different from regular College activities so even more lead time may be necessary. Be sure to consider other events occurring on campus that may impact others' abilities to assist you. Planning ahead and communicating regularly are the best strategies.

Keep the Grants Office Informed

Any grant has the potential to deviate from the plan or to go awry. Address issues before they become a crisis. Contact your supervisor and the Grants Office if you see things beginning to get off track. Support is available for you and we all want our grant projects to be successful. Monthly compliance meetings will be set up to assist with ensuring the College is meeting its requirements for the grant.

Closely Monitor the Grant Budget

One of the keys to successful grants management is paying as close attention to the financial side as to the program side of grants. Meeting program objectives is only half of the job. The most common challenges and audit findings in grants are related to budgets. Grant awards result from highly competitive processes with other institutions and organizations and are viewed as investments of public and private dollars in the future of Harper College and its mission. The College is ultimately held accountable for proper use and stewardship of these dollars. If you have any questions about your budget, for example, whether or not something is allowable and allocable, please contact the Grants Office.

Example for budget management: Make sure to compare the percentage of time elapsed and percentage of total spent. For example, if 75% of the grant period has

elapsed but only 30% of the grant budget has been expended, the success of the grant is likely to be impacted. The College does not want to have to return funds to the funding agency and also does not want to not meet the objectives of the grant. In some cases, grant expenses may be charged to the wrong budget or budget line. Those types of errors need to be corrected early.

Meet All Reporting and Deliverable Deadlines

Adherence to the proposed work plan and project timeline is also critical to the success of grant projects. Just as we had to submit the grant proposal on time to be eligible for the award, all reports and deliverables must also be submitted to the funding agency by the due date – no exceptions. Ensure there is sufficient lead time for preparing reports, particularly if you are depending on other individuals or departments to provide input. Remember that reports must be submitted to the Grants Office five days prior to the due date. Failure to submit reports and deliverables timely may disqualify the College from receiving follow-on funding (where available) or applying for other grant programs in the future.

Contacting Funding Agency Representatives or Program Officers

Only Grants Office staff, or individuals designated by that office, are authorized to contact funding agencies. Often the questions you may have can be answered internally by the Grants Office staff. Funding agency personnel also could be inundated with the same questions from various areas of the College which could lead them to feel that Harper is disjointed and not working together as a unit. We want to avoid any situations that could put Harper in an unfavorable light or potentially damage Harper's reputation and rapport with funding agencies.

Maintain All Grant Records

Always maintain all grant records and keep a separate grant file for each grant award. It is the responsibility of the project director to ensure there is an auditable trail for all grant activities, both programmatic and financial. The Grants Office maintains the master grant file, so it is imperative that all grant-related documents are forwarded to the Grants Office. For assistance with setting up your grant file, please review Appendix B: Compliance and File Review Checklist.