

GRANTS POLICY

I. Policy Section

11.0 Business Functions

II. Policy Subsection

11.2 Grants Policy

III. Policy Statement

Support for the mission, values, and strategies of Grand Rapids Community College (GRCC) is obtained through grants awarded from government entities and public, private, corporate and professional foundations, and philanthropic sources (hereafter referred to as “sponsor(s)”).

The Grants Policy applies to all aspects of grant-related activities, including but not limited to, grant proposal development, grant submissions, grant award implementation and administration, and grant award closeout.

IV. Reason for the Policy

The purpose of the Grants Policy is to establish requirements for all aspects of grant-related activities at GRCC and to ensure compliance with applicable college, government, and sponsor rules, laws, regulations, and policies.

V. Entities Affected by this Policy

All GRCC faculty and staff members who are involved in any aspect of grant proposal development, submissions, grant award implementation and management, and grant award closeout.

VI. Who Should Read this Policy

All GRCC faculty and staff members who are involved in any aspect of grant proposal development, submissions, grant award implementation and management, and grant award closeout.

VII. Related Documents

A. College Documents

1. All GRCC Policies
2. GRCC Guide to Grant Development (Pre-Award)
3. Grant Concept Form
4. Administrator’s Pre-Approval Form

5. Grant Submission Approval Form
6. Grant Partnership Approval Form
7. Subrecipient Commitment Form
8. Evaluation of Subrecipient Commitment Form
9. GRCC Guide to Grant Administration (Post-Award)
10. GRCC Subaward Grant Template
11. Subrecipient or Contractor Classification Checklist
12. Annual Risk Assessment Form
13. Uniform Guidance Monitoring Assessment
14. Time and Effort Certification Form
15. Potential Conflict of Interest Reporting Form for Grants

B. Other Documents (laws, regulations, guidelines)

1. Education Department General Administrative Regulations (EDGAR)
2. OMB Uniform Guidance (2014) drawn from OMB Circulars A-21, A-87, A-110, and A-122; Circulars A-89, A-102, and A-133; and the guidance in Circular A-50 on Single Audit Act follow-up.
3. Title 2 of the Code of Federal Regulations (CFR)
4. National Science Foundation, Proposal & Award Policies & Procedures Guide (PAPPG)
5. Federal Register Notice (08/25/2011) - Issuance of the Final Rule on Financial Conflict of Interest Regulations
6. Federal Register Notice (08/13/2020) – Final guidance - Guidance for Grants and Agreements
7. Other applicable federal, state, and local regulations

VIII. Contacts

Policy Owner: Director, Grants Department

IX. Definitions

1. **Administrative proceeding:** A non-judicial process that is adjudicatory in nature in order to make a determination of fault or liability (e.g., Securities and Exchange Commission Administrative proceedings, Civilian Board of Contract Appeals proceedings, and Armed Services Board of Contract Appeals proceedings). This includes proceedings at the Federal and State level but only in connection with performance of a Federal contract or grant. It does not include audits, site visits, corrective plans, or inspection of deliverables.
2. **Application:** A request for financial support of a project/activity, submitted to a sponsor in accordance with instructions provided by the sponsor (see also “proposal”).
3. **Award:** The provision of funds or direct assistance to provide general financial assistance to an organization or an individual to carry out an activity or program (see also “grant”).

4. **Contract (under a grant):** A legal instrument by which an entity procures goods and services from another party to carry out a project or program. A contract creates a procurement relationship with the contractor.
5. **Cost Sharing (or matching):** The portion of grant project costs not paid by sponsor funds.
6. **Grant:** A financial assistance mechanism whereby money and/or direct assistance is provided to an eligible entity to carry out an approved project or activity and made on the basis of a submitted proposal, usually in response to application guidelines (see also “award”).
7. **Grant Agreement:** A legal instrument for the transfer of funds from the sponsor to the grantee, which sets forth the terms and conditions of the award.
8. **Grantee:** The organization or other entity that receives a grant and assumes legal and financial responsibility and accountability both for the awarded funds and for the performance of the grant-supported program or activity.
9. **Grant Award Notification:** An official document signed by an authorized official stating the amount and the terms and conditions of an award for a discretionary grant.
10. **Sponsor:** The governmental unit, foundation, or other entity that awards grants.
11. **Project Director:** The individual primarily responsible for the preparation, conduct, and administration of a grant, cooperative agreement, training, contract, or other sponsored project in compliance with applicable laws, regulations, and institutional policies.
12. **Proposal:** A request for financial support of a project/activity, submitted to an external sponsor and in accordance with instructions provided by the sponsor (see also “application”).
13. **Sub-Award:** A sub-award is an agreement with a third-party organization performing a portion of a GRCC sponsored project. The terms of the relationship (sub-grant/subcontract) are influenced by the prime agreement, and all sub-awards must be monitored to ensure that the subrecipient complies with these terms. Federal regulations for sub-recipient monitoring are found in OMB Uniform Guidance.
14. **Subrecipient:** The legal entity to which a subaward is made and which is accountable to the recipient for the use of the funds provided. Subrecipients must adhere to the administrative regulations of the prime award.

X. Procedures

1. Grant Development and Submission

The Grants Department shall be responsible for developing, implementing, and maintaining procedures to support the requirements of the Grants Policy. The Grants Department shall assist faculty and staff members in interpreting and applying this policy and those of sponsors. All GRCC faculty and staff are expected to adhere to procedural steps as outlined here and in the Grant Development Guide (Pre-Award) to develop and submit a grant application, proposal, or bid for a grant contract.

Supervising Administrator Pre-Approval: No GRCC faculty or staff member shall begin grant development activities, or act as a representative of the College to seek grant support, without first obtaining pre-approval from their Dean or supervising administrator and the Director of the Grants Department. The Administrator's Pre-Approval Form provides documented approval for the faculty or staff member to proceed with grant development activities in partnership with the Grants Department.

a) Research, Planning, and Proposal Development: The Grants Department shall work with faculty and staff to locate grant opportunities and develop proposals that are well-written and complete through preliminary planning, team coordination, and writing and editing support. Sufficient lead time for proposal development and review by executive leadership is required prior to submission of a grant proposal, and shall be set by the Grants Department.

Communication with Sponsors: To maintain strong relationships with sponsors and ensure consistent communications through a single point of contact, Grants Department staff or the Executive Director of the GRCC Foundation shall serve as the primary contacts with all sponsors.

b) Grant Submission Approval: Prior to the submission of a grant proposal by GRCC, a Final Submission Approval Form is required to be signed by the President, Provost, Vice President for Finance and Administration, and the Director of the Grants Department. The Grants Department shall seek submission approval by providing the grant proposal, budget, and Final Submission Approval Form to the executive team for their review. Upon approval, the Director of the Grants Department shall be responsible for performing a final review of the grant proposal and related documentation to be submitted for completeness and compliance with the Grants Policy and applicable College, government, and sponsor rules, laws, regulations, and policies. Failure to obtain required approvals prior to grant proposal submission may result in withdrawal of the grant proposal from the grant competition.

c) Authorization to Submit Grant Proposals: The President of GRCC, Chair of the Board of Trustees, Vice President for Finance and Administration, and the Director of the Grants Department shall have the authority to sign and submit grant proposals on behalf of the College.

d) Authorization to Accept Grant Awards: The President of GRCC or Vice President for Finance and Administration shall have the authority to sign and accept grant agreements or contracts on behalf of the College.

Grant Partnership Approval: No College faculty or staff member shall engage with an external entity in grant development activities, or act as a representative of the College to obtain grant support as a partner with an external entity, without first obtaining pre-approval to participate in such activities from their Dean or supervising administrator and the Director of the Grants Department. This pre-approval is required when GRCC will participate as a potential grant sub-recipient or contractor, GRCC is required to submit a letter of commitment, and/or GRCC is required to sign a Memorandum of Agreement/Memorandum of Understanding related to a grant project. Prior to the submission of a grant proposal in which GRCC will be a partner, a Grant Partnership Approval Form is required to be signed by the President, Provost, Vice President for Finance and Administration, and the Director of the Grants Department.

2. Implementation and Administration of Grant Awards

Deans, department heads, and duly assigned faculty and staff (project leads) shall be responsible for implementing and managing grant awards received by their departments in compliance with this policy and the terms and conditions of each grant contract. All College faculty and staff are expected to adhere to procedural steps as outlined here and in the GRCC Guide to Grant Administration (Post-Award) to implement and administer a grant-funded project.

Grant Award Initiation: Upon notification of an award, the Grants Department shall conduct a post-award meeting with the Deans or department head, duly assigned faculty and staff (project lead) and the Grant Accounting Specialist to review grant project timelines, evaluation and data collection procedures, project outcomes, reporting requirements, College policies and procedures, and sponsor/contract terms and conditions of award.

Grant Award Monitoring: The Grants Department staff shall provide ongoing technical assistance throughout the grant period, including but not limited to, communicating with sponsors regarding all types of project modifications, assistance with monitoring subrecipients (as applicable), completion and submission of non-financial reports, and developing strategies to address issues as they arise. Annually, the Grants Department shall conduct a review of all grant awards for which the College is the fiscal agent to ensure

compliance with the College policies and applicable laws and regulations governing the sponsored project.

Financial Administration: The Accounting and Budget Services Department, the Grant Accounting Specialist, or a delegate, shall be responsible for the financial administration of grant awards in compliance with this policy and the terms and conditions of each grant contract as follows:

- a. The Accounting and Budget Services Department, the Grant Accounting Specialist, or a designee, shall have exclusive authority to deposit and draw down all grant funds awarded to the College according to government and sponsor requirements and internal College policies.
- b. The Accounting and Budget Services Department and the Grant Accounting Specialist, or a delegate, shall conduct internal audits, and external audits by an independent auditor, as required by sponsors and applicable Office of Management and Budget (OMB) Uniform Guidance and 2 CFR 200.
- c. The Accounting and Budget Services Department and the Grant Accounting Specialist, or a delegate, shall ensure that costs charged to each award are allowable under 2 CFR 200, under additional cost principle(s) applicable to each specific grant and under the terms and conditions of each applicable Federal grant agreement.
- d. The Accounting and Budget Services Department and the Grant Accounting Specialist, or a delegate, shall be responsible for all financial reports required by sponsors.

Documenting and Tracking Cost Share: The project lead shall be responsible for documenting the types of cost share (match) contributions and amount/value of certain cash and in-kind matching funds. The Accounting and Budget Services Department and the Grants Accounting Specialist, or a delegate, shall be responsible for calculating the value of in-kind staff/faculty time, unrecovered indirect costs, and the overall tracking of matching funds. For Federal awards, any shared costs or matching funds and all contributions, including cash and third-party in-kind contributions, shall meet the criteria outlined in 2 CFR 200.306.

Certification of Time and Effort: As a recipient of grant funding from Federal agencies, the College shall comply with requirements for certifying effort expended by employees on all Federal and non-Federal grant projects. Grant-funded project staff and faculty for whom a portion of time is committed to working on a grant, their supervising administrator, and the Grant Accounting Specialist, or a delegate, will ensure that the time spent on grants by employees is appropriately documented, that the payroll costs charged to the grants reasonably reflect the effort expended on the grant project, that the allocations are certified by authorized personnel in a timely manner, and that

the certifications comply with sponsor requirements and Federal regulations (2 CFR 200.430; 2 CFR 200.431).

External Evaluation of Federal Grants: As a recipient of grant funding from Federal agencies, the College may be required by the Federal sponsor to participate in a third-party evaluation of a grant program. The evaluation may include an experimental impact evaluation wherein eligible participants will be randomly assigned to the program or to a control group that does not receive the program. The evaluation may involve making records on participants, employers, or funding available; providing access to program and partner personnel and participants; facilitating random assignment by conducting a lottery of participants to program services (including the possible increased recruitment of potential participants); and following evaluation procedures as specified by the evaluator(s) under the direction of the Federal agency, including after the period of operation.

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

Conflict of Interest Reporting for Federal Grants: All project leads, grant-funded employees, and employees whose efforts are used to satisfy a required or voluntary cost share on a Federal grant must comply with College policies and procedures related to conflicts of interest. In addition, as a recipient of grant funding from Federal agencies, the College shall comply with Federal regulations related to financial conflicts of interest. The Potential Conflict of Interest Reporting Form for Grants shall be used by the Grants Department for monitoring compliance with this requirement.

Sub-award Agreements: As a prime recipient of grant funding from Federal agencies, the College may negotiate subawards with other entities. During the Federal grant development process, the need for services provided by an entity other than College will be determined by the Grants Department per the sponsor's guidelines and the request for proposals.

- a. The Grants Department shall be responsible for conducting the pre-award risk assessment of potential subrecipient entities prior to the submission of a grant proposal by College, as required by 2 CFR 200. The Subrecipient Commitment Form will be used for this purpose. The Grants Department will maintain documentation of the pre-award risk assessment and submit documents and results to the Accounting and Budget Services Department if/when the subaward is executed.

- b. Upon grant award notification, the project lead shall be responsible for completing the Subrecipient or Contractor Classification Checklist. The Grants and Contracts Specialist and Grant Accounting Specialist, or a delegate, shall assist the project lead in making the subrecipient/contractor determination per 2 CFR 200.331. The final determination shall be retained as part of the official project records.
- c. Upon determination of subrecipient status, the Director of Grant Development shall assist the project lead in drafting the subaward agreement as outlined in 2 CFR 200.332(b) and (d) for review and approval by the College's General Counsel and Vice President for Finance and Administration, and other executive leadership as necessary. Upon approval, the Grants Department and project lead shall submit the subaward to the subrecipient for review and execution.
- d. Throughout the award period, the project lead shall be responsible for maintaining active lines of communication with subrecipients; reviewing technical and performance reports; reviewing and approving invoices to ensure charges are reflective of the activities/performance accomplished during the time period covered by the invoice; approving invoices in a timely manner to ensure payment can be processed within the 30-day Federal requirement; approving final invoices so that closeout procedures can be accomplished within Federal deadlines.
- e. The Grants Department and Grants Accounting Specialist, or a delegate, shall be responsible for assisting the project lead in monitoring subrecipients in accordance with 2 CFR 200.332(b) and (d) through annual risk assessment procedures. The Annual Risk Assessment Form and Uniform Guidance Monitoring Assessment will be used for annual monitoring purposes. Annual risk assessment procedures will be used to categorize subrecipients into one of three risk levels: Standard Risk, Medium Risk, and High Risk. The categorization will determine the nature and extent of monitoring procedures that shall occur throughout the year.
- f. As appropriate, the project lead will develop a report identifying observations noted from monitoring procedures and issue the report to subrecipients for review and corrective action. As a result of the monitoring procedures and reporting, the project lead will follow up with subrecipients to determine whether adequate corrective action was taken. In instances in which subrecipients have not taken adequate corrective action, the project lead will assess the need for potential penalties as permitted by the subaward agreement with the applicable subrecipient. Regarding audit reports received from subrecipients, the Grants Accounting Specialist, or a delegate, will review and issue a management decision to each subrecipient regarding corrective action needs, disallowances, and other matters.

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

3. Grant Award Closeout

Upon termination of an award, the College shall take the steps necessary to ensure timely and complete closeout of financial transactions as well as submission of reports related to the award. In addition, as a recipient of grant funding from Federal agencies, the College shall comply with Federal requirements outlined in 2 CFR 200.344 for the closeout of the award.

- a. The project lead, with assistance from the Grants Department, shall be responsible for performing all closeout activities, including the closeout of sub-awards, in a timely manner and in accordance with sponsor requirements and College procedures.
- b. The Grant Accounting Specialist, or a designee, shall be responsible for preparing all final financial reports and performing financial closeout of the project in compliance with sponsor requirements.

XI. Forms

N/A

XII. Effective Date

June 3, 1991

XIII. Policy History

A policy, "Proposals/Grant Awards," was created in 2009 to designate authority to the President of GRCC to submit grant applications to funding sources on behalf of the College. The reason for the policy was to give staff clear direction regarding the ability to apply for grant funding. This policy expands upon the Proposals/Grant Awards policy to give more clarity and guidance to faculty and staff about college and legal regulations and guidelines governing grants.

Revised October, 2019
Revised February, 2023

XIV. Next Review/Revision Date

October, 2027