

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, submissions, and grant award implementation and management.

A. 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 applications, proposals, and bids for grant contracts on behalf of the College.

B. 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.

C. Requirements for Grant Submissions

1. All grant proposals that are submitted to sponsors by GRCC, or in which GRCC is named as a partner, must support the mission, vision, values, and strategic goals of GRCC.

2. No GRCC faculty or staff member shall use the name of the College, or act as a representative of the College, in securing grant support without first obtaining pre-approval from their supervising Dean or executive administrator and the Director of the Grants Department.

3. If pre-approved, the Director of the Grants Department shall review and approve all grant applications, proposals, and bids for grant contracts to be submitted by GRCC, or in which GRCC participates as a partner, for compliance with the Grants Policy and applicable college, government, and sponsor rules, laws, regulations, and policies.

4. The Director of the Grants Department shall seek final approval to submit or participate in the submission of a grant application, proposal, or bid for a grant contract from the Vice President for Finance and Administration, Provost, and President.

5. Failure to obtain required approvals prior to grant proposal submission can result in withdrawal of the grant proposal from the grant competition.

D. Responsibility for Implementation of the Grants Policy

1. Deans, Department Heads, and duly assigned faculty and staff 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. Assigned project directors are responsible for submitting all reports required by funders. The Grants Department will determine the need to assist with the completion and submission of reports to sponsors on a case-by-case basis.

2. 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.

a) The Accounting and Budget Services Department, the Grant Accounting Specialist, or a delegate, shall have exclusive authority to deposit and draw down all grant funds awarded to GRCC according to government and sponsor requirements and internal GRCC policies.

b) The Accounting and Budget Services Department and the Grant Accounting Specialist, or 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 Title 2 of the Code of Federal Regulations.

c) The Grant Accounting Specialist, or delegate, shall assist the Grant Project Director in monitoring that sub-recipients comply with the requirements of appropriate standards for good business practices, including internal controls in accordance with OMB Circular A-133 Audits of States, Local Governments, and Non-Profit

Organizations. The Grant Accounting Specialist, or delegate, shall receive assurance from the sub-recipient that it complies with A-133 and that the sub-recipient will notify GRCC of completion of required audits and of any adverse findings, which impact the sub-award. GRCC shall receive a copy of the sub-recipient's A-133 audit report before entering into, or renewing, the sub-award.

d) The Grant Accounting Specialist, or delegate, shall be responsible for all financial reports required by sponsors.

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, and grant award implementation and management.

VI. Who Should Read this Policy

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

VII. Related Documents

A. College Documents

1. All GRCC Policies
2. GRCC Guide to Grant Administration
3. Administrator's Pre-Approval Form
4. Grant Submission Approval Form
5. Grant Partnership Approval Form
6. Time and Effort Certification Form
7. Grant Concept Form
8. Grant Development Process Flow Chart

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. Other applicable federal, state and local regulations

VIII. Contacts

Policy Owner: Director, Grants Department

IX. Definitions

- A. **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”).
- B. **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”).
- C. **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.
- D. **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”).
- E. **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.
- F. **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.
- G. **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.
- H. **Sponsor:** The governmental unit, foundation, or other entity that awards grants.
- I. **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.

- J. **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”).

- K. **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.

- L. **Sub-Recipient:** The legal entity to which a sub-award is made and which is accountable to the recipient for the use of the funds provided. Sub-recipients must adhere to the administrative regulations of the prime award.

X. Procedures

A. Grant Development Process

The Grants Department shall be responsible for developing, implementing, and maintaining procedures to support the requirements of the Grants Policy. The Grants Department will assist faculty and staff members in interpreting and applying this policy and the policies and regulations of sponsors. All GRCC faculty and staff are expected to adhere to procedural steps in the process to develop a grant application, proposal, or bid for a grant contract as follows:

1. **Research, Planning and Proposal Development:** The Grants Department works with faculty and staff to locate grant opportunities and develop proposals that are well-written and complete through preliminary planning, coordination, writing, and editing support. Sufficient lead time for proposal review by executive leadership is required prior to submission of a grant proposal. This time line will be provided by the Grants Department.

2. **Communication with Funding Sources:** To maintain strong relationships with sponsors and ensure consistent communications through a single point of contact, Grants Department staff serve as the primary contacts with all sponsors.

3. **Pre-Approval Process:** No GRCC faculty or staff member shall engage in grant development activities, or act as a representative of the College to secure grant support, without first obtaining approval from their supervising Dean or executive administrator and the Director of the Grants Department. The Administrator’s Pre-Approval Form provides written approval to the Grants Department to proceed with grant development activities.

4. **Grant Partnership Pre-Approval Process:** No GRCC faculty or staff member shall engage with partners in grant development activities, or act as a representative of the College to obtain grant support as a partner with another entity, without first obtaining approval from their supervising Dean or executive administrator and the Director of the Grants Department. A signed Grant Partnership Approval Form is required to be submitted to the Grants Department prior to the submission of a grant proposal in which GRCC will be a partner. This pre-approval is required when GRCC is: participating as a grant sub-recipient or contractor, is requested to submit a letter of support or letter of commitment, or is required to sign a Memorandum of Agreement related to a grant project.

5. **Final Approval and Submission:** A Grant Submission Approval Form must be submitted to the Director of the Grants Department at least two weeks prior to submission of all grant applications, proposals, or bids for grant contracts. This form requires signatures from the Director of the Grants Department, the Vice President for Finance and Administration, Provost, and President. The Grants Department submits all applications to sponsors to ensure that forms are accurately completed, all required documentation is included, and that submission deadlines are met.

B. Post-Award Procedures

Post-award procedures are listed in the GRCC Guide to Grant Administration. Project directors or leaders on grant projects must:

1. Provide a copy of any grant award letter contract, and grant budget to the Director of the Grants Department and the Grant Accounting Specialist, or delegate, upon receipt from the sponsor. A post-award meeting with Grants Department staff and the Grant Accounting Specialist shall be scheduled with new project directors to review grant policies and procedures.
2. Coordinate with the Grants Department to obtain authorized signatures on contracts in a timely manner. Carefully review the grant proposal and award letter and/or contract to verify the award amount, the budget breakdown, timelines, and reporting requirements.
3. Be responsible for adhering to grant report deadlines. All reports must be submitted to the Grants Department for review a minimum of five (5) working days prior to the deadline.
4. Work with the GRCC Communications Department to announce the award. Adhere to the sponsor's policies on publicity and promotion in announcing the award.
5. Complete required Time and Effort Certification Forms in a timely manner, as deemed appropriate by the Grants Accounting Specialist, or delegate.
6. File annual Institutional Review Board (IRB) documentation with the Institutional Research and Planning Department, if required.

C. Grants Administration

The Grants Department plays a limited role in the administration of funded grant projects. Information about grant project management is provided in the GRCC Guide to Grants Administration.

1. Management of grant projects is conducted by the project director assigned to the project during the grant development process.
2. Financial management of grants is conducted by the Accounting and Budget Services Department, the Grant Accounting Specialist, or a delegate.
3. Human Resources is responsible for the process to hire new employees supported by grant funds.
4. The Institutional Research and Planning Department assists in gathering and analyzing data needed for evaluation of the project, as necessary.
5. The Grants Department provides ongoing technical assistance as needed throughout the grant period.
6. The Grants Department conducts an annual file review of all grant awards for which the college is the fiscal agent to ensure compliance with the applicable laws, regulations, and institutional policies governing the conduct of the sponsored project.

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.

XIV. Next Review/Revision Date

April, 2022