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PREFACE

The Title III Policies and Procedures manual was compiled to facilitate the implementation of activities funded by the Title III Program. It is designed to provide specific policies and procedures unique to the Title III Program, to support the proper monitoring and evaluation of program activities and to ensure the appropriate expenditures of program funds. This manual serves as a resource document in carrying out the approved plan.

Compliance with the guidelines and regulations in this manual will ensure that the grant is administered in accordance with the U.S. Education Department General Administrative Regulations (EDGAR) and other Federal directives and affirms that West Virginia State University has the documentation necessary to show compliance.

This manual will be updated periodically as changes in policies are made by the U.S. Department of Education and the University. It is effective until replaced by an updated version.
INTRODUCTION

Purpose
Title III of the Higher Education Act of 1965, as amended, Strengthening Historically Black Colleges and Universities (HBCU) Program, authorizes a program of special assistance to strengthen the quality of developing institutions which have the desire and potential to make a substantial contribution to the higher education resources of the nation but are struggling for survival and are isolated from the main currents of academic life. Amendments to the Act have altered some elements of the program, but it remains as written – an instrument to provide assistance to institutions demonstrating a constructive effort to strengthen themselves.

West Virginia State University has three grants funded under Title III: (1) Historically Black Colleges and Universities (HBCU), (2) Historically Black Colleges and Universities Master’s Program, and (3) Title III Part F HBCU/SAFRA, Student Aid and Fiscal Responsibility Act award programs. Each program has funded project activities designed to help meet various University strategic goals.

(A) ALLOWABLE ACTIVITIES
1. Purchase, rental or lease of scientific or laboratory equipment for educational purposes, including instrumental or research purposes.
2. Construction, maintenance, renovation and improvement of classroom, library, laboratory and other instructional facilities, including purchases or rental of telecommunications technology equipment or services.
3. Support of faculty exchanges, faculty development and faculty fellowships to assist faculty members in attaining advanced degrees in their fields of instruction.
4. Academic instruction in disciplines in which Black Americans are underrepresented.
5. Purchase of library books, periodicals, microfilm and other educational materials, including telecommunications programs materials.
6. Tutoring, counseling and student service programs designed to improve academic success.
7. Funds and administrative management and acquisition of equipment used to strengthen funds management.
8. Establishing or improving a development office to strengthen or improve contributions from alumni and the private sector.
9. Establishing or enhancing a program of teacher education designed to qualify students to teach in public elementary or secondary schools in the state that shall include, as part of such programs, preparation for teacher certification.
10. Other activities that it proposes in its application that contribute to carrying out the purpose of this part and are approved by the Secretary as part of the review and acceptance of the application.
(B) UNALLOWABLE ACTIVITIES

1. Activities that are not included in the grantee’s approved application.
2. Activities described in paragraph (a)(12) of this section that are not approved by the Secretary.
3. Activities that are inconsistent with any State plan of higher education that is applicable to the institution.
4. Activities that are inconsistent with a State plan for desegregation of higher education that is applicable to the institution.
5. Activities or services that relate to sectarian instruction or religious worship.
6. Activities provided by a school or department of divinity. For the purpose of this section, a “school or department of divinity” means an institution, or a department of an institution, whose program is specifically for the education of students to prepare them to become ministers of religion or to enter upon some other religious vocation, or to prepare them to teach theological subjects.

(C) No award under this part may be used for telecommunications technology equipment, facilities or services, if such equipment, facilities or services are available pursuant to section 396(k) of the Communications Act of 1934.

(D) Endowment funds. If a grantee uses part of its grant funds to establish or increase an endowment fund, it is subject to the provisions of §§628.3, 628.6, 628.10 and 628.41 through 628.47 of this chapter with regard to the use of those funds, except—
1. The definition of the term “endowment fund income” in §628.6 of this chapter does not apply. For the purposes of this paragraph (d), “endowment fund income” means an amount equal to the total value of the fund, including fund appreciation and retained interest and dividends, minus the endowment fund corpus.
2. Instead of the requirement in §628.10(a) of this chapter, the grantee institution must match each dollar of Federal grant funds used to establish or increase an endowment fund with one dollar of non-Federal funds, and
3. Instead of the requirements in §628.41(a)(3) through (a)(5) and the introductory text in §628.41(b) and §628.41(b)(2) and (b)(3) of this chapter, if a grantee institution decides to use any of its grant funds for endowment purposes, it must match those grant funds immediately with non-Federal funds when it places those funds into its endowment fund.

The full citation for the HBCU and HBCU Masters programs can be found in 34 CFR, Parts 608.10 and 609.
RELATIONSHIP TO THE UNIVERSITY’S MISSION

Mission Statement
Founded in 1891, West Virginia State University is a public, land-grant, historically black university, which has evolved into a fully accessible, racially integrated and multi-generational institution. The University, “a living laboratory of human relations,” is a community of students, staff and faculty committed to academic growth, service and preservation of the racial and cultural diversity of the institution. Its mission is to meet higher education and economic development needs of the state and region through innovative teaching and applied research.

The undergraduate education at the University offers comprehensive and distinguished baccalaureate programs in business, liberal arts, professional studies, sciences and social sciences. The University provides master’s degrees and other opportunities for graduate education.

West Virginia State University offers flexible course schedules in traditional classrooms, in non-traditional settings and online. With the goal of improving the quality of our students’ lives, as well as the quality of life for West Virginia’s citizens, the University forges mutually beneficial relationships with other educational institutions, businesses, cultural organizations, governmental agencies, and agricultural and extension partners.

The following values guide our decisions and behavior:
• academic excellence;
• academic freedom;
• advancement of knowledge through teaching, research, scholarship, creative endeavor and community service;
• a core of student learning that includes effective communication, understanding and analysis of the interconnections of knowledge, and responsibility for one’s own learning;
• lifelong growth, development and achievement of our students;
• development of human capacities for integrity, compassion and citizenship;
• our rich and diverse heritage;
• personal and professional development of our faculty and staff; and
• accountability through shared responsibility and continuous improvement.

West Virginia State University is a vibrant community in which those who work, teach, live and learn do so in an environment that reflects the diversity of America. Our comprehensive campus provides vast opportunities for our students. We take great pride in our accomplishments and envision building upon our baccalaureate and graduate programs and our excellence in teaching, research and service.
The Activities requested for support under Title III were developed with the mission, purposes and goals of the University in mind. Each activity under Title III is governed by a set of objectives, and each objective is related specifically to one or more of the institution’s long-range goals. In order to ensure its continued success and the implementation of all planned activities, the administration will:

- Recommend policies and develop procedures to ensure adherence to Federal regulations and provide a clear audit trail;
- Provide support services to facilitate maximum implementation of funded activities;
- Recommend policies and develop procedures to facilitate Title III proposal development and submission; and
- Recommend changes to activities which will enhance the program in line with expected goals and objectives.

Title III will establish, encourage and facilitate programmatic activities focused on physical plants, financial management and academic resources in order to strengthen and enhance West Virginia State University.
USING THIS MANUAL

This Policies and Procedures Handbook provides guidance and compliance directives on the implementation of the three Title III Programs: Strengthening Historically Black Colleges and Universities (HBCU), Strengthening Historically Black Colleges and Universities Master Programs (HBCU MASTERS), and the Student Aid and Fiscal Responsibility Act (SAFRA) mandatory grant at West Virginia State University. It contains important information on grant terms and conditions for improving programs and services of the University using support from the Title III HBCU, HBCU MASTERS and SAFRA Programs.

Administrative procedures for Title III HBCU and HBCU MASTERS funded activities follow the approved policies and practices of West Virginia State University. Please note: Federal Law (EDGAR*) requirements and Federal auditing practices (OMB Circulars) may conflict with current University policies and practices. In all cases, Federal law will supersede policies and practices of West Virginia State University. This Handbook will be updated; however, periodic updates may be required to ensure that the University’s policies and procedures reflect applicable Federal guidelines and practices.

In support of our compliance efforts, this Handbook provides assistance to activity directors, coordinators and other key personnel in carrying out the objectives and implementation strategy of the approved Plan of Operation. It is to be used as a guide for ensuring adherence to all guidelines and regulations listed.

As grant requirements change, revisions or additions to the Handbook will be necessary to ensure compliance. All activity directors and coordinators must become familiar with the grant requirements included therein, keep up to date on all administrative procedures, and ensure that policies and procedures are followed carefully. All persons using Title III funds should refer to this Handbook before charging expenditures. Questions concerning Title III matters should be directed to Title III administrative personnel.

Department of Education General Administration Regulations: 34 CFR; as of June 23, 2005
ADMINISTRATIVE STRUCTURE OF
THE TITLE III ADMINISTRATIVE OFFICE

TITLE III DIRECTOR’S RESPONSIBILITIES
The principal responsibility for administering and managing all Title III activities rests with the Director, who serves as a liaison among constituents of the University, the U.S. Department of Education, and other individuals or groups on matters which impact the Title III program.

The Director is responsible for monitoring the completion of objectives and outcome measures for all activities according to the approved Annual Grant Performance Report. Additionally, the Director manages and approves expenditures for all federal funds within the two Title III programs and one Title VII program. As a government sub-contractor, West Virginia State University is bound by federal rules and regulations. Compliance with these guidelines is a necessary condition for funding the Title III programs. Specifically, the Director is responsible for:

• Keeping the President apprised of the status of all Title III activities by working closely with Activity Directors and other relevant University personnel;
• Providing overall leadership to the programmatic aspects of Title III;
• Submitting Annual Grant Performance Reports and budget revisions when required;
• Coordinating internal and external evaluations to assess program impact on all programs;
• Disseminating Title III program information internally and externally;
• Ensuring that the implementation process of Title III activities is consistent with the U.S. Department of Education guidelines and recommendations, as well as West Virginia State University’s policies, procedures and line/staff relationships;
• Approving all expenditures of the grant and monitoring daily Title III expenditures;
• Assisting in the development of University-wide proposals, reports and other documents related to the administration of Title III programs;
• Cooperating with the Business and Finance Office to ensure that an efficient and effective system for fiscal control of Title III is maintained; and
• Ensuring that all Title III activities remain consistent with the University’s mission, goals and long-range plans.
DIRECTOR OF BUSINESS AND FINANCE
Fiscal Control of Title III Funds

West Virginia State University’s Research and Development Corporation’s Business and Finance Office oversees the management and accounting for all grants and contract funds. However, the fiscal and reporting policies of the U.S. Department of Education, through guidelines issued in the Education Department General Administrative Regulations (EDGAR) and rules in the Federal Registrar, require a more detailed management and recordkeeping system than is usually practiced by operating units of the University. Federal regulations require a complete accounting of all federal and University time and resources which directly impact the grant’s activities.

Fiscal Policies and Regulations

A copy of each project’s budget shall be transmitted from the Business and Finance Office to each project director after formal notification of grant approval has been received. The use of funds not expended at the end of the current budget period has to be approved for carry-over through the Business and Finance Office via the U.S. Department of Education. These requests must be received in the Grants Office 45 days before the end of the budget period in which the funds are unexpended.

ACTIVITY DIRECTOR’S RESPONSIBILITIES

The Activity Director is primarily responsible for carrying out the approved activity’s plan, achievement of objectives, outcome measures, progress reports and fiscal year budget parameters. Each Activity Director reports to the appropriate administrator within the existing administrative structure of the University. Specifically, the Activity Director is responsible for:

- Preparing and submitting to Title III administration, complete and accurate progress reports of activity progress toward objectives;
- Monitoring and reporting timely completion of activity objectives;
- Requesting Title III funds via requisitions in accordance with approved activity budgets and University policies;
- Approving travel requests;
- Reviewing and signing quarterly Time and Effort Reports. All Title III personnel must submit a Time and Effort Report quarterly; and
- Monitoring activity on the budgets.
**PROGRAM EVALUATION**

Evaluation of an activity determines the extent to which specified objectives have been met. Additionally, it provides information relative to strengths and areas to strengthen for an activity. As a result of a comprehensive and effective evaluation, decision-makers and/or stakeholders can make the following decisions:

1. Which activities of a program should be continued?
2. Which activities need to be revised/modified?
3. Which activities should be discontinued?

Two types of evaluations are typically conducted at West Virginia State University:

**Formative** – to provide and process data on how well an activity is progressing toward completing the objectives. Recommendations may be made on how to best complete the objective.

**Summative** – is a product end of the activity assessment. It provides data on the extent to which objectives have been completed and whether the activity should be continued.
OVERVIEW OF ADMINISTRATIVE POLICIES

West Virginia State University has established policies and procedures for the effective and efficient administration of the Title III Program and personnel.

The following administrative policies are applicable:

• All governing policies and procedures of the West Virginia State University Research and Development Corporation (R&D Corp.) are applicable to Title III personnel and activities.

• Commitments that require the use of Title III funds but not specifically included in the approved Title III grant shall not be made. Questions concerning this should be directed to the Business and Finance Office and clarity sought prior to making such commitments.

• All requests involving expenditures from Title III budgets must be forwarded to the Business and Finance Office by the Activity Director to ensure clearance for allowability and availability of funds for final processing and prior to making any commitments. **Requests should be forwarded in sufficient time (5 working days) to allow for clearance prior to processing. All Title III charges must be made to the appropriate line item.** Funds designated for one line item may not be used for another line item, unless appropriate budget revisions are requested and approvals granted by the Title III Administration.

• The University is required to spend Title III funds in a manner consistent with the provisions of the final approved operating plan. If modifications are necessary to the objectives and milestones of a particular activity as the program progresses, then such changes should be reflected in budgetary revisions. Budget revisions must be within Federal guidelines and must have the approval of the Title III Director and the President.

• All Purchase Orders must be forwarded directly to the Business and Finance Office for clearance prior to final processing.

Under no circumstances should a business arrangement be made with an outside vendor without satisfying all administrative requirements.

**Reimbursements will only be made for expenditures that were approved prior to purchase, and original receipts must accompany requests for reimbursement through the Business and Finance Office.**
OPERATIONAL POLICIES AND PROCEDURES

Substantive changes in the general plan of any Title III Activity must be approved by the Department of Education in writing prior to implementation. Requests for modification of any programmatic objective must be made through the Business and Finance Office. If approved by the President, subject modifications will be included in the annual report submission to the Department of Education. It is only after approval is received from the Department of Education that changes may be effected. The Department of Education defines substantive changes to an institution’s program as those changes which redirect the objectives and scope of an activity, changes in key personnel, and continuation of the project for more than three months without the direction of a Project Director.

PERSONNEL
This category includes all full-time, part-time and temporary employees who are supported by Title III funds. Hiring procedures will follow R&D Corp. policy. The Title III Director must be consulted to ensure that the hiring of persons for Title III activities is within the framework of the approved plan and to ensure that appropriate funds are available to accommodate the action. Title III funds may not be used to supplant the use of University funds in the hiring process.

The following actions must be completed for all persons being paid with Title III funds:

- A Hiring/Advertising Request must be initiated for any position that will be funded by Title III. The request will be initiated by the supervisor and routed to the appropriate Vice President, Dean or department head for initial approval. After initial approval the request should be routed to the Director of Business and Finance and then the Title III Director for final approval. It is then delivered to the Payroll/Human Resource Office for processing.
  - The Supervisor is expected to coordinate this approval process to determine the source of funding that will be used for the position.
  - The position is required to be posted for a minimum of five (5) working days internally/externally.
  - Candidate selection process.
  - New employee orientation.
  - Notice of Appointment sent (after job accepted) by Human Resource Specialist.

A hiring request should be initiated and final approval made by the Title III Director, prior to the employment of any individual receiving salary under Title III programs. Personnel funded by Title III should not be hired or terminated without notifying the Title III Director, Director of Business and Finance, and the Payroll/Human Resources Office. It is the responsibility of the Activity Directors to ensure these actions are routed through the Business and Finance Office.
It should be noted that the R&D Corp. is not obligated to offer appointed personnel the budgeted salary amount. Salaries are subject to federal funding and based on expected duties and responsibilities, experience, and qualifications needed to perform the assigned duties in a particular position.

Individuals hired should clearly understand that they are being supported by Federal funds and that their employment is contingent upon the receipt of those funds and the overall success of their Activity.

FRINGE BENEFITS
Fringe benefits are available to persons supported by Title III funds, as allowed by WVSU R&D Corp. policy. Benefits are available to regular employees who work a normal schedule of at least 25 hours per week. Benefits for eligible employees begin exactly 31 days after their initial hire date. For more information concerning benefits, please contact the Payroll/Benefits Office.

STUDENT EMPLOYMENT
Student employment under Title III-funded Activities is an appropriate and beneficial use of resources. It is expected that student work assignments will be directly linked to an approved Title III Activity and that these assignments will be value-added experiences for the students. Activity Directors are also expected to budget and closely monitor the expenditure of student wages. This should include ensuring that funds are available and adhere to all Department of Education and University regulations regarding student employment.

The Title III student employment process requires coordination with 1.) Business and Finance Office, 2.) Office of Human Resources, and 3.) Payroll. The decision to employ a particular student worker under Title III Programs rests solely with the Activity Director and the Title III Director. The following conditions apply to all Title III student workers:

- Student workers normally work during regular University operating hours unless otherwise approved.
- Student workers will not be paid for working on official university holidays. In no case should a student be paid for hours not actually worked.
- Student work assignments should be tied to the specific funded Activity or the day-to-day operation of the unit directly supporting the activity.
- During the fall and spring semesters, students may work up to twenty (20) hours per week; however, some graduate student workers, because of the level of service they provide, may work up to thirty (30) hours per week. Such cases should be documented and approved by the Title III Director in advance. During the summer term, students may work up to thirty (30) hours per week.
- Students must be enrolled as full-time students during the fall and spring semesters and enrolled for at least 3 credit hours during the Summer term or the full-time equivalent for graduate students.
- Students may not under any circumstances work in more than one Title III-funded position.

Pay rate should be determined by the Activity Director and based on the following: 1.) Budget allocation; 2.) Level of service provided or job function; and 3.) Experience of student applicant. Undergraduate students should be paid between $7.35 and $10.00 per hour and graduate students should be paid on a basis of reasonable standards.
In order for student wage requests to be processed in a timely manner, the supervisor must ensure that all of the following are completed:

- R&D Corp. Student/Temporary Employment Application*
- Current Form W-4*
- State of West Virginia Employees Withholding Allowance Certificate*
- Form I-9 (U.S. Department of Homeland Security)*
- West Virginia State University Equal Employment Opportunity Information Request*
- West Virginia State University Personal Data and Emergency Contact Change Form*
- Work Visa Documentation for noncitizens
- Documents that establish both identity and employment eligibility

*These forms can be obtained from the Human Resources Department

**TIME SHEETS**

In order for a student to receive payment through the Title III Program once he/she has been approved for employment, a completed time sheet must be submitted to the R&D Payroll Office with the student’s signature and the supervisor’s signature. Time sheets are due by noon on the 11th and 25th of each month. Failure to submit these by the due date may result in a delay in a student being paid.

**PROCUREMENT POLICIES AND PROCEDURES**

All requests for supplies, equipment, services, rentals, subscriptions or any other transactions that involve an expenditure of Title III funds require the initiation of a Purchase Order. Purchase Orders for goods or services in the amount of $5,000 or more must be let out for bid when the items are not already covered by competitively bid contracts. Original copies of the three (3) lowest bids must accompany the Purchase Orders through the R&D Corp. accounting system.
When preparing the Purchase Orders for processing, one should include on the form the program (Title III and the name of the activity) and the date that the Purchase Order is prepared. The name of a suggested vendor should be indicated on the documents. Solicitation for goods and services must provide all the following:

- A clear and accurate description of the technical requirements for the material product or service to be procured. In competitive procurement, descriptions shall not contain features, which unduly restrict competition.
- Requirements that the bidder/vendor must fulfill and all other factors to be used in evaluating bids or proposals.
- A description, whenever practicable, of technical requirements in terms of functions to be performed or performance required, including the range of acceptable characteristics or minimum acceptable standards.
- The specific features of a brand name or description that bidders are required to provide when these items are included in the solicitation.

In accordance with the Education Department General Administrative Regulations (EDGAR), recipients of Federal awards, such as Title III, shall take all the following steps:

- Ensure that small businesses, minority-owned firms and women’s business enterprises are used to the fullest extent practicable.
- Make information on forthcoming opportunities available and arrange timeframes for purchases and contracts to encourage and facilitate participation by small businesses, minority-owned firms and women’s business enterprises.
- Consider in the contract process whether firms competing for larger contracts intend to subcontract with small businesses, minority-owned firms and women’s business enterprises.
- Encourage contracting with consortiums of small businesses, minority-owned firms and women’s business enterprises when a contract is too large for one of these firms to handle individually.
- Use the service and assistance, as appropriate, of organizations such as the Small Business Administration and the Department of Commerce’s Minority Business Development Agency in the solicitation and utilization of small businesses, minority-owned firms and women’s business enterprises.

After one has properly prepared the Purchase Orders and attached all relevant documentation, including quotes/bids and signatures, procedures as established by the Business and Finance Office should be followed. Activity Coordinators are required to route all requests for purchases through the Activity Director or the appropriate senior administrator in that managerial structure. The Business and Finance Office will not process Purchase Orders without appropriate authorization signatures. **An authorized representative of the Office of Information Technology must sign off on all computer purchases.**
Under no circumstances will any Title III representative engage in any formal contract or other commitment with outside vendors without prior approval and adherence to the appropriate process of required Purchase Order documentation.

**PURCHASE ORDER PROCESS**
The standard Purchase Order form of the Research and Development Corporation must be used for Title III Activities. Purchase Orders are used to give the Business and Finance Office detailed and specific information regarding items to be purchased.

The requesting individual, usually the Activity Coordinator or Director, must adequately describe procurement needs. The Purchase Order should be typed and include the following information:

- **Suggested vendor and address:** All catalog sections should reflect page and item numbers. Enter the vendor’s name, address, telephone number and fax number (if available) in the spaces provided. The order will be mailed if a fax number is not provided.
- **Funding Source or Program:** Indicate the name of the funding source or program in which the expenditure is to be paid. If unsure about program information, please verify with the Budget Officer or Fiscal Specialist prior to document submission.
- **Date:** Indicate the current date of the Purchase Order.
- **Quantity:** Indicate the amount/quantity needed for each item.
- **Descriptions:** Clearly describe the supplies, materials or equipment, and service specifications.
- **Unit Price:** Indicate the per unit (each) price/cost of the requested items. If more than one unit is being ordered, also complete the price extension column. These columns must be completed before submission to the Title III Administrative Office.
- **Requested by:** The signature of the person requesting the orders should be entered in the space provided.
- **Approved by Department Head:** The signature of the department head/vice president is provided in this space. This signature must be on the Purchase Order before the Budget Officer can process.
- **Budget Officer Approval:** The signature of the Budget Officer shall be entered in this space. The Budget Officer will forward to the Title III Director.
- **Approved by the Title III Director:** The Title III Director will sign in this space. In the absence of the Title III Director the Director of Business and Finance will sign.

Once the order has been processed by the Business and Finance Office and forwarded to the designated vendor, a copy of the Purchase Order will be forwarded to the requesting department as verification of ordered merchandise. Invoices will be forwarded to accounts payable for payment.
EQUIPMENT
Purchases of equipment shall adhere to the following guideline and governing directives. The recipients shall use the equipment in the Activity for which it was acquired as long as needed, whether or not the activity continues to be supported by Title III funding. When the equipment is no longer needed for the original intent, the activity Director or Coordinator will notify the Title III Administration for appropriate disposition of the equipment.

During the time that the equipment is used in the activity for which it was acquired, the Activity Director shall make it available for use on other projects or programs if other use will not interfere with the work on the program for which the equipment was originally acquired. First preference for other use shall be given to other projects sponsored by the Department of Education; second preference shall be given to projects or programs sponsored by other Federal awarding agencies.

Attached to Purchase Orders (for the purchase of equipment) must be evidence that the user has attempted to locate the least expensive supplier of that equipment item. Federal policy defines equipment as an item costing $5,000 or more with a useful life of at least one year. In accordance with Federal directives, equipment that is made by two or more manufacturers and costs $5,000 or more requires three official bids from prospective vendors.

SOLE SOURCE PROCUREMENT
Sole Source Procurement occurs when only one vendor is known to supply a particular item requested for purchase. This method of purchasing involves no competition and should be avoided as much as possible. If used, the sole source procurement should be justified and well documented. Evidence of such documentation should be retained for record keeping purposes.

Final responsibility in determining whether an item is a proprietary item and should be purchased from a sole source is determined by the Business and Finance Office.

EMERGENCY PURCHASES
Purchases made under emergency conditions must be limited to those goods and/or services required to meet the emergency condition. Such emergencies are defined as:

“A condition, which creates a threat to the health, welfare or safety of staff and/or students.
Situations, which endanger lives, property or the continuation of vital programs.”

An equipment inventory form must be completed and provided to Title III Administration for all equipment purchases; in addition, a statement that clearly identifies the control system in effect (which ensures that adequate safeguards are in place to prevent damage or theft to the equipment) should be included on the inventory form. The purchase of equipment with Title III funds may be permissible only after receiving approval from the Title III Administration.
EQUIPMENT MANAGEMENT REQUIREMENTS (EDGAR 74.34/80.32)

Procedures for managing equipment (including replacement equipment) until transfer, replacement, or disposition takes place shall, at minimum, meet the following requirements:

• Proper records shall be maintained accurately. Retention and access requirements for these records are explained in subpart D of the Education Department General Administrative Regulations (EDGAR). For each item of equipment, the records shall include:
  - A description of the equipment, including the manufacturer’s model number, if any;
  - An identification number;
  - Identification of the grant under which the recipient acquired the equipment;
  - The information needed to calculate the Federal share of the equipment;
  - Acquisition date and unit acquisition cost;
  - Location, use, and condition of the equipment and the date the information was reported; and
  - All pertinent information on the ultimate transfer, replacement, or disposition of the equipment.

A physical inventory of equipment shall be taken and the results reconciled with the property records every six months to ascertain the existence, current utilization, and continued need for the equipment. A statistical sampling basis is acceptable. Any differences between quantities determined by the physical inspection and those shown in the accounting records shall be investigated to determine the cause of the differences.

• A control system shall be in effect to ensure adequate safeguards to prevent loss, damage or theft of the equipment. Any loss, damage or theft of equipment shall be investigated and fully documented.
• Adequate maintenance procedures shall be implemented to keep the equipment in good condition.
• Where equipment is to be sold, the Federal Government has a right to part or all of the proceeds. Under no circumstances should equipment procured with Title III funds be sold without the written permission of the Title III Director.

Equipment is approved for use in the achievement of goals of each Activity and should be moved only if the Activity is being moved to different quarters at the University or the equipment is required for use in another department attached to the University. The Corporation must be notified prior to the relocation of any equipment or furniture items.
SUPPLIES
“Supplies” means materials or provisions stored and dispensed when needed.
• Grantees should purchase supplies from Title III funds only in amounts reasonably expected to be required for the performance of the grant Activity.
• Supplies should be procured on a timely basis to reflect use of the supplies during the period of grant support.

Although there are no requirements for accountability for supplies similar to those for equipment, the Activity Director is expected to maintain those records necessary to support the purchase receipts and proper charge of supplies in accordance with good management practice.

CONTRACTS
Costs associated with sub-grants and payments to cooperating institutions or agencies are defined as contract costs. Payments to individual consultants are not included under this classification.

MISCELLANEOUS EXPENSES
• Direct costs for items not covered in any of the previously mentioned classifications are included here. Examples are communications, transportation (freight, parcel post, etc.), space, equipment rental, computer use charges, and consultant fees and expenses.

Each approved fiscal year budget forwarded from the Business and Finance Office to individual Activity Directors will contain a budget control number for each line item subsumed under each classification it is a part of the specific activity.

EXPENSES NOT COVERED
The Title III Administration will establish procedures for handling expenses not covered in any of the areas previously discussed on a case-by-case basis.

HIRING PROCEDURES
Procedures used in hiring persons wholly or partially supported by Title III funds will be identical to those currently in practice at the Corporation. The same approvals are required as would be required in hiring persons supported by institutional funds.

TIME REPORTING AND RECORD KEEPING
The Federal government requires that grant recipients conduct time-keeping for all full-time and part-time employees assigned to grant projects. The following steps are to be used:
• A Time and Effort Report form is included in the Policies and Procedures Manual. The form may be duplicated. Activity Directors, Administrative assistants, secretaries, faculty/staff and graduate student assistants are required to complete and submit a Time and Effort Report quarterly.
• The report should be signed by the employee and the Activity Director.
• The report must be submitted to the Business and Finance Office by the 15th day of each quarter.

TITLE III REQUIREMENTS
• Approved Budget for each Fiscal Year
• Final Performance Report for each Fiscal year
• OE Report ED Forms 851 and 852
• Approved Job Descriptions
• Monthly Time and Attendance Report
• Quarterly Time/Effort Report
• Travel Reports
• Consultant Services
• Requisitions for Purchases
• Evaluations (Internal and External)
• Request for Personnel
• Personnel Action Forms
• Performance Progress Report
• Annual Inventory of Equipment
• Payroll Services Report
• Financial Status Report (SF 269)
• Budget Change Forms
• Phase I Formula Grant Data
• Phase II Budget Data
DEPARTMENT OF EDUCATION REPORTING REQUIREMENTS

The Department of Education requires the Research and Development Corporation to maintain records that show the amount of funds awarded under each grant, how the spending of funds related to the overall effectiveness of the institution, how the grant funds were used, the total scope of the project and other records to aid in facilitating an effective audit. The Corporation must keep records that demonstrate compliance with program requirements and records that show significant project expenses and results. These records must be retained for five years after the final financial reports are submitted for the Activity for which the funds were granted.

APPLICATIONS FOR CONTINUED FUNDING UNDER TITLE III

Proposed activities, which are approved by the Title III Director for continued funding under Title III, must be applied for during the spring semester of the year currently funded, the application must provide the following information:

- **An Activity Narrative:** The activity narrative for continuing activities will be composed of the parts that are described in the following paragraphs.

- **A Preliminary Annual Performance Report:** An Annual Performance Report for Activities will be submitted each year during the month of October and will reflect accomplishments from October 1st of the previous calendar year to September 30th of the current year. A preliminary Annual Performance Report should be provided at the time the application for continued funding is submitted. This report should describe the activity’s accomplishments to date based on the objectives included in the approved budget. If applicable, a description of any modification to the current plan of operation should be included.

- **Activity Objectives for the Next Budget Period:** Objectives for the next year should be included and must be described in clear, concise, measurable terms. These objectives must include the attainment measurement in qualitative or quantitative terms, to the extent possible.

- **An Evaluation Plan:** The evaluation plan must provide a detailed assessment of the implementation strategies and quantifiable or qualitative evidence of the attainment of the objectives for each Activity for each grant year.

- **An Activity Budget:** All budgeted items are to be reflected in the format provided by the Department of Education, including major items such as Personnel, Fringe Benefits, Travel, Equipment, Contractual Services, Student Wages and others that allow the Activity to function as efficiently as intended.
TIME AND EFFORT REPORTING REQUIREMENTS

The Department of Education requires the University to document and maintain Time and Effort Certifications on all federally supported employees. Internal procedures have been developed to ensure adherence to this requirement.

- The Business and Finance Office provides notification to all employees supported by a federally funded program of the requirements needed to complete a Monthly Accountability Record.
- Each employee is required to complete the Monthly Accountability Record, accessible through the LiveText site. The Record is due to the Business and Finance Office fifteen (15) days after the last day of the reporting month.
- Business and Finance Office will provide additional notification to employees who miss the deadline to further ensure that this requirement is satisfied in a timely manner.

Monthly Accountability Records are maintained in the LiveText Database.

MAINTENANCE OF RECORDS

The Business and Finance Office will maintain records of budgetary expenditures for Title III Activities.

Each Activity Director is expected to maintain records of expenditures for the specific activity. This additional record keeping will provide up-to-date information relative to the availability of funds and will serve as a cross-reference in the event of contradiction of budget balances maintained in other offices associated with the accounting aspects of the program.

The Business and Finance Office will provide monthly budget reports to Activity Directors.

Supervisors are expected to maintain records of the actual time spent on activities by personnel in the specific Activity. It is important that the University be able to document this time in order to meet internal and external audit requirements.

NOTE: Activity Directors are expected to ensure that personnel funded by Title III comply with this requirement. Failure to do so may result in the suspension of future Title III funding.

REPORTS OF PROGRESS IN ACHIEVING TITLE III OBJECTIVES

Both internal and external evaluations are management tools used to keep the program focused on annual objectives. EDGAR states that recipients shall monitor the performance of grant supported activities and report progress according to program requirements. The evaluation should review programmatic progress to assure that positive efforts are being made toward achieving the goals of the grant.

Internal evaluations will be carried out through quarterly monitoring reports, annual progress reports and semiannual Title III workshops. Annual external evaluation is recommended. External evaluation will determine progress in achieving the objectives in the approved application, the effectiveness of the project in meeting the purposes of the program and the effect of projects on the persons directly impacted by the projects.
Quarterly Reports of Progress: In order to provide systematic documentation of the achievement of objectives for each of the grant Activities, each Activity Director will complete a report of progress in achieving grant objectives each quarter. The report is to be placed on the forms provided by the Corporation. Copies of the forms are included in this Manual. Quarterly Reports are due according to the schedule below:

<table>
<thead>
<tr>
<th>Report 1</th>
<th>(October 1 – December 31) -------- Due January 15</th>
</tr>
</thead>
<tbody>
<tr>
<td>Report 2</td>
<td>(January 1 – March 31) ------------------------- Due April 15</td>
</tr>
<tr>
<td>Report 3</td>
<td>(April 1 – June 30) ----------------------------- Due July 15</td>
</tr>
<tr>
<td>Report 4</td>
<td>(July 1 – September 3) --------------------------- Due October 15</td>
</tr>
</tbody>
</table>

FAILURE TO SUBMIT QUARTERLY REPORTS BY THE NOTED DUE DATES MAY RESULT IN AN ACTIVITY BECOMING INELIGIBLE FOR CONTINUED TITLE III FUNDING.

Annual Progress Report: In addition to the Quarterly report, each Activity Director will submit an evaluation of the extent to which objectives have been met during the grant year. This report must be in narrative format, depicting the significant impact funding had on the area and the Activity’s contribution to the overall strategic plans of the University. Specifically, this report should include:

- A final narrative summary of the year’s Activity, due by October 30 of each year.
- A narrative summary of all activity from the quarterly reports for the past four (4) quarters.
- The status of your budget (e.g., all funds expended, or some funds remain in the following line items, if so, an explanation why.)
- The institutional impact of the Activity. In this section, step back from the immediate view of discrete tasks to view the overall impact on the institution. In a reflective, semi-evaluative mode, put your grant activities into the larger context of the University as a whole. Ideas for doing so should include:
  - Describing the direct or indirect positive impact the grant activities are having on other areas of the University. The intent is to describe the ripple effect of your Activity within the institution.
  - Describing any cooperative activities with other units and staff of the University (non-Title III) and/or with other Title III Activities and their impact on the institution. Include the expertise of non-grant personnel devoted to the project.

EXTERNAL EVALUATION

An independent external evaluator at the discretion of the University President will evaluate the entire Title III grant, as well as the individual Title III Activities. The evaluator will conduct both a formative and summative evaluation. Evaluators will look at all aspects of grant activities including actual accomplishments compared to the goals established for the period, documentation and project expenditures, as well as the effect of the project in strengthening the overall operation of the institution.
EXPLANATIONS FOR TITLE III DETAILED REPORTING REQUIREMENTS

1. **Approved Budget for Each Fiscal Year**
   The U.S. Department of Education requires that under a multi-year grant each activity budget must be submitted and approved prior to expending funds for the new fiscal year. This budget revision will reflect expenditures of the previous year and projections for the coming year, as approved in the Grant Performance Report. All funds should be expended by the end of the budget period. Funds remaining after September 30 will not be available for the next budget period. Remaining funds at the end of the budget year will be transferred to a priority account for University-wide use after September 30.

2. **Grant Performance Report for Each Fiscal Year**
   The U.S. Department of Education requires a detailed Grant Performance Report for each new fiscal year under a multi-year grant. The Report includes accomplishments/outcomes for the current budget year, objectives, implementation strategies and expected outcomes, personnel needed to carry out objectives, evaluation schemes, budgets, and budget notes.

3. **OE Reported ED 851-851a**
   These forms are included in the Grant Performance Report and must be prepared for each new fiscal year by each activity. ED Form 851, Activity Objectives and Anticipated Results, contains the specific objectives and anticipated results to measure success. The Implementation Strategy/Timetable Form contains the specific tasks to be completed.

4. **Approved Position Descriptions**
   Each individual employed under Title III should have a copy of an approved position description on file in the Human Resources Office. The position description should be followed very closely. Federal funds awarded under this grant shall be used to supplement (increase the level of institutional funds), and in no case supplant or replace institutional funds, e.g., moving regularly performed duties of individuals or costs to federal budget.

5. **Quarterly Time and Effort Report**
   Each person employed under Title III must prepare and submit to the administrative office a quarterly Time and Effort report.

   If Time and Effort Reports are not received in the Business and Finance Office by 5 p.m. on the 15th of each quarter, requisitions will not be processed until reports from all personnel are submitted.

   Time and Effort Reports should be written in the **past tense**. The report should document specific actions completed **quarterly** to achieve a specified objective cited in the Performance Report.

6. **Consultant Services Request**
   Responsibility for contracting the services of consultants shall rest primarily with the respective Activity Director.

   All requests for consultants must be filed on a Request for Consultant Services Form at least two weeks in advance of the time service is to be rendered.

   No consultant will be paid if prior approval was not obtained from the appropriate sources as indicated on the appropriate form.
The Activity Director for the respective project must file the Consultant Report Form with the Business and Finance Office within seven days after the consultant services have been rendered.

The following information must be considered before submitting the Request for Consultant Services Form:

- The consultant must qualify as an independent contractor.
- Consultant fees from federal funds may not be paid to a full-time employee of the federal government.
- Services to be provided are essential and cannot be provided by persons receiving salary support in the area of responsibility.

7. Requisitions for Purchase
All requests must be prepared in accordance with Corporation regulations and submitted to the immediate supervisor for signature of approval and sent to the Business and Finance Office for final approval prior to the issuance of the purchase order. All requests should have the activity title, budget account number and reference objectives prior to submission to the Business and Finance Office.

Purchased supplies, services and equipment must conform to those items listed in the Title III budget notes.

8. Internal and External Evaluations
The Director of Business and Finance or the Title III Director will schedule an annual internal and external evaluation which will consist of a program and a fiscal audit. This evaluation will involve all Title III activities. It will be the responsibility of the Business Office to arrange or conduct the fiscal audit.

9. Personnel Action Forms and Personnel Action Forms Graduate Student Assistantships
A copy of employment, resignation, transfer or termination of any individual employed under Title III should be on file in the Human Resources Office. These forms should originate and be returned to the Office of Business and Finance through the appropriate channels.

10. Performance Progress Report
Each Activity Director is responsible for preparing and submitting to the Business and Finance Office a Mid-Year Progress Report of accomplishments in the activity. This report is due March 31st of each year.

11. Annual Inventory of Equipment
Each Activity Director is responsible for the inventory of equipment. All equipment purchased with Title III funds must be tagged with the Title III Inventory tag as well as logged on the Title III Inventory Log. In addition, all equipment must be inventoried by the Department of Property Management.

12. Payroll Service Report
Each Activity Director is to have on file a copy of the Payroll Service Report each month for all personnel employed with Title III funds.

13. Budget Change Form
All budget changes should be documented on the Budget Change Form and signed by the appropriate individuals, and sent to the Business and Finance Office.
PROGRAM ACCOUNTABILITY AND EVALUATION

Coordination: Each project shall be developed so as to be in coordination, to the extent feasible, with other programs at the University with similar educational purposes. Such coordination shall continue during the period in which such project remains in effect.

Evaluation: Each project shall include procedures for effective evaluation of the extent to which project objectives are being met.

Site Visit: Site visits will be made by representatives of the Department of Education to (a) review program accomplishments and management control systems, and (b) provide such technical assistance as may be required.

Monitoring by Recipients: Recipients shall constantly monitor the performance under federally supported Activities to assure that adequate progress is being made toward achieving the goals of the Activities. This review shall be made for each function or Activity as set forth in the approved grant application or contract document.

Records Related to Grant Funds: A grantee shall keep records that fully show (a) the amount of funds under the grant, (b) how the grantee uses the funds, (c) the total cost of the project, and (d) the share of the cost provided from other sources.

Records Related to Compliance: A grantee shall keep records to show compliance with program requirements.

Records Related to Performance: A grantee shall keep records to identify significant project experiences and results and use the records to (a) determine progress in accomplishing project objectives; and (b) revise those objectives, if necessary.

Records Retention Period: Unless a longer period is required under 34 CFR part 74, a grantee shall retain records for five (5) years after the completion of the Activity for which it uses grant funds.

Unexpended Funds: In the event that the amounts previously awarded have not been obligated pursuant to the approved project and, in the judgment of the Education Secretary, will not be obligated for such purposes, the Secretary may upon notice to the recipient, reduce the amount of the grant or contract to an amount consistent with the recipient’s needs pursuant to regulations regarding termination and suspension for cause.

Termination and Suspension for Cause: Assistance under any Federal program to which this part is applicable may be terminated in whole or part if the Secretary determines, after affording the recipient reasonable notice and an opportunity to be heard, that the recipient has failed to carry out its approved project proposal in accordance with the applicable law and the terms of such assistance, or has otherwise failed to comply with the law, regulations, assurance, term or conditions of the grant or contract.
TRANSFER OF FUNDS
Due in part to a provision cited in 34 CFR [74.25] of EDGAR, the transfer of funds from one Activity to another during a grant year is permitted with the approval of the University Title III Director and the President of the University. In general, grantees no longer have to seek department approval for budget transfer in non-construction projects except as stated in [74.25] (c) and in cases where the Department has imposed a 10 percent limitation on cumulative budget transfer for grants over $100,000 [80.30] (c) (1)(ii).

Budget Transfers
All budget transfer requests
• Must be to carry out activities that are within the approved scope of the application;
• Must meet the test of reasoning or reasonability and allowability; and
• Must meet other Federal statutes, regulations, and grant conditions.

The Title III Director cannot process requests for payment of Activity expenses unless all required documentation is submitted. The various forms required to support fiscal monitoring of the Title III grant are detailed in this manual. The person making the request may obtain additional copies of these forms. A copy of all documentation associated with the fiscal management of Title III funds shall be retained in the Business and Finance Office, Activity Director’s or Title III Director’s files.

Budget Process
Each Activity Director will be provided with an annual line-item budget and periodic budget status reports. Status reports should be carefully reviewed against the records and documentation maintained by the Activity and any discrepancies noted should be shared with the Title III Director. Efforts to resolve these with the Business and Finance Office will be coordinated by the Title III Staff.

Periodic budget analysis should also be conducted by the Activity Directors to ensure that Title III funds are being spent in a timely and efficient manner. The exception is that annual funds will be utilized in a manner which ensures that the objectives of the Activity are accomplished. Any deviations or discrepancies should be explained in the Quarterly Reports.
**Budget Revisions**

The procedures for requesting budgetary revisions are the same as those for the regular programs of the Research and Development Corporation with some modifications.

- The Request for the Budget Revision form may be obtained from the Business and Finance Office or Title III Administration.
- The Form must be returned to the Title III Administration signed by the requestor.
- When the review and approval form is completed by the Title III Director, the Request for Budget Revision form will be forwarded to the Business and Finance Office.

**Activity Directors are expected to carefully monitor their program objectives and related expenditures to ensure that milestones are being completed in a timely manner and that expenditures are commensurate with accomplishments.**

Reports of expenditures and balances per line item will be provided by the Business and Finance Office to assist the Activity Director with managerial responsibilities. These reports should be used in conjunction with records of the Activity Directors to note trends toward overspending and/or under spending and to take corrective steps.
SUPPLANTING VS. SUPPLEMENTING

Title III Grant funds may not supplant any service, program or position which is supported by University resources prior to awarding of the Federal Grant. Adequate records must be maintained to document accountability for any use of regular University staff in Title III Grants.

Supplant means to “take the place of.” Supplement means to “add something to complete a thing.” While most grantors make that fact very plain in their grant literature, some are not as explicit. Nevertheless, you can rest assured they do not want you using their money to supplant a program you already have in place.

Most grantors are interested in helping you improve academic performance in some way. You can usually do that by implementing a new program that has shown promise in other schools or by expanding a program that has been successful in your own school. You usually have to come up with the money for that new or expanded program. Grantors often supply that money.

Supplanting a program is different. That means you put a new program in the place of an old one. To do that, you should be able to use the money that you were using for the old program to put the new one in place. If you do, it is unlikely you would need grant money.

Some schools try to write grants that allow them to supplant one of their current programs in an effort to shift their money to another curriculum area. For example, an abundance of English grant money might be available at the time, but the school really needs money to shore up its math program. The grant writer applies for an English grant for enough money to fund the reading program that is already in place, then the district shifts that budget money over to the math department so they can improve their math program with a promising supplemental program.

In theory this sounds like a workable plan for the school. In fact, it is a form of fraud. At the very least, it is deceitful. Grantors are usually very specific about what they are trying to accomplish with their giving and to deceive them is wrong. You might very rarely see a grantor who is willing to add money to your general budget, but it is unusual to find such a grant.

It is important in your application to let grantors know you are supplementing a program rather than supplanting one. In your narrative, it is recommended that you clearly describe how you plan to begin a new program or supplement a current program in order to improve that academic area in your school.

If you do not currently have an after-school program that tutors math students who are struggling, then you are supplementing your regular math program when you set up your tutoring program. If you do not currently have a computer lab that allows students who are struggling to better understand instructional concepts, then you are supplementing your math program when you set up such a computer lab. There are many ways to supplement a current program to improve it.

You should always clearly understand how a new or supplemental program will improve your overall academic program and clearly explain that in your grant application. If you struggle to prove that your grant program is truly supplemental, then it probably isn’t.
TRAVEL PROCEDURES

1. Travel Eligibility
Faculty and staff members are eligible to apply for Title III travel funds for Faculty/Staff Development purposes. Operational definitions are as follows:

- **Faculty**: Faculty eligibility for travel is defined as faculty or research assignment rank at 51 percent FTE (not on temporary status) and above.
- **Staff**: Staff eligibility for travel is defined as directors, supervisors and coordinators at 100 percent FTE (not on temporary status). No more than three (3) staff members may travel from any one department for a faculty/staff development opportunity of the same date, place and time.
- **Administrator**: Administrators are not eligible for travel. Administrators are defined as vice presidents, associate/assistant vice presidents and deans.

Priority will be given to faculty and staff members who are presenting papers or serving as panelists or facilitators. An applicant may only be awarded funds once per grant year. Priority will also be given to faculty or staff members who have not attended a conference within the previous two years. Faculty and staff travel will be approved by the Project Director and the Title III Director on a case-by-case basis. The determination will be made based on a written plan, ability to justify the plan, and internal and external regulations. The plan must address:

- Direct service to the institution (how will the training be used to strengthen the institution);
- Institutional critical need areas (will the training address a major institutional challenge identified in the Title III project); and
- A connection to the institution’s strategic plan.

The plan must be furnished in writing to the project director as part of the letter of request submitted with other travel request documents.

2. Travel Request Procedures
To initiate a request for travel, the faculty or staff member must write a letter of request signed-off by his or her immediate supervisor and addressed to the project director.

The travel request documents must be routed through the institutional approval process as follows:

- Department Chair, Vice President for Academic Affairs, Title III Director, and Business and Finance Office.

3. International Travel
As a general rule, international travel may not be allowed under Title III; however, in rare cases, such travel may be approved on a case-by-case basis. The potential for international visibility for the institution and faculty/staff member will be determining factors in the approval process. There will be no more than two (2) requests approved in any given grant year.

Approval for international travel must meet the above-mentioned criteria regarding submission of a written plan, ability to justify the plan, and compliance with internal and external regulations.
STRENGTHENING FACULTY/STAFF DEVELOPMENT AND ADMINISTRATIVE MANAGEMENT

ELIGIBILITY FOR TRAVEL
Any faculty (defined as an instructor who teaches at 51% FTE, minimally) or staff person (defined as Coordinators and Directors) who are employed full time by the University and who are not on temporary status are eligible to apply for a Title III travel award. The Vice President for Academic Affairs (VPAA), the Dean and the Title III Director reserve the right to determine need based on justification, documentation and regulations. Attendance at conferences must be related to the employee’s departmental goals, objectives, and major duties or special duties as assigned by an appropriate supervisor.

Employees within a department, as listed in the Members of the Administration/Faculty and Staff publication, are eligible. Priority is given to faculty and staff members who have not attended a conference within two years funded by Title III, and to faculty and staff who are presenting papers or serving as panelists or facilitators. West Virginia State University faculty presenters must list the name of the University on the conference program.

Employees are eligible for travel funds only once per academic year. In extenuating circumstances and where sanctioned by the VPAA or other senior-level supervisors, an employee may apply for and receive a second grant. The second grant is usually awarded if the faculty is presenting a paper or serving on a distinguished panel. Leaders at roundtables are not eligible for this second grant.

PROCEDURES FOR TRAVEL REQUEST
1. To apply for travel, the full-time employee should write a letter of application to the VPAA. The letter should be signed by the employee’s immediate supervisor. The letter should address the following:
   • The sponsoring organization, agency or school.
   • Where the development experience will be held.
   • The estimated cost.
   • Why and/or how the conference will relate to the applicant’s departmental goals, objectives and/or assigned duties.
   • A copy of the conference announcement enclosed with the letter
   • The objective that applies to each request must be listed on the requisition.
2. To reduce the paperwork burden, the applicant may leave a space on the letter for the immediate supervisor to sign. In the case of conflict, a letter from the Vice President for Academic Affairs will be accepted, but an applicant must exhaust protocol.
3. A travel authorization must be completed prior to traveling.
TRAVEL EXPENSE STATEMENT

Travel Expense reports for reimbursement must be submitted within 15 days of the last date of travel or will be subject to non-reimbursement.

REGISTRATION

Eligibility

Full-time faculty and staff members who wish to attend conferences related to their departmental goals, objectives, and major duties or special duties assigned by an appropriate supervisor are eligible to request payment of registration fees. The Vice President for Academic Affairs and the Title III Director reserve the right to determine need based on justification and documentation.

Generally, registration fees of up to $500 will be honored; more expensive workshops may be honored if the employee agrees to give a presentation to departmental colleagues sharing the results of the seminar/workshop or a written report to colleagues.

PROCEDURE

To apply for payment of registration fees, the applicant should complete a requisition form leaving the budget information blank. The form should be completed in its entirety and sent to the Business and Finance Office with a completed registration form from the organization, school or agency.

If the award is granted, the VPAA will inform the applicant and ask the Business Office to send the payment directly to the organization.

The Business and Finance Office will not reimburse without prior approval. If the applicant applies in ample time, on-site registration will not be necessary; therefore, more expensive reimbursement will not be necessary.

STIPENDS/FELLOWSHIPS

CONDITIONS FOR ELIGIBILITY

1. Financial support under this program requires a minimum of one year of service to the institution. Upon completion of the recipient’s educational objective(s), the faculty member will serve one year for each year of full-time reimbursement. A faculty or staff member voluntarily leaving the University’s service prior to the expiration of a one-year period will be required to refund to the University an amount equal to the grant received.

2. In the event more than one application is received from a single department (or administrative unit), the Department Chair (or Administrative Head) will be responsible for prioritizing the applications based on the department’s (or administrative unit’s) needs, consistent with the Strategic Initiatives, and with the approval of the Vice President for Research and Public Service (VPRPS).

3. Employees must be full-time and have a minimum of one year permanent status to be eligible for stipend reimbursement.
PROCEDURE FOR OBTAINING FUNDS

1. The employee should develop a plan of study and reach mutual agreement with the immediate supervisor, Dean and Vice President for Research and Public Service.

2. Upon approval from all officials listed above, the faculty or staff member should send a letter of support to the VPRPS with appropriate signatures.

3. The VPRPS will send an approval letter, a letter of inquiry or a letter of rejection to the applicant.

4. If the VPRPS sends a letter of approval, the faculty or staff member will apply for graduate school during the agreed-upon semester.

5. After the registration period is over, the faculty or staff member will submit official receipts for reimbursement of tuition and books. An official receipt comes from the university’s registrar, bursar or business office with a stamp or seal. Book receipts should have a clear indication of the place of purchase. All receipts must be original.

6. Recipients must agree to observe and honor Title III requirements, which include (1) signing a letter of agreement, (2) sending grade reports to the VPRPS’s Office each grade period, and (3) sending a final transcript to the President’s Office.

CONDITIONS FOR WITHDRAWAL OF AWARDS

1. Recipients who withdraw from a course(s) or school and fail to inform the VPRPS or VPAA will forfeit further funding.

2. Recipients who are reimbursed for full-time credit and drop back to part-time will reimburse the Corporation an amount equivalent to the number of hours dropped.

3. Support will be terminated immediately upon discovery that the recipient is not pursuing the agreed-upon educational objective(s) or making satisfactory progress as defined for graduate-level study by the institution the employee is attending.

4. Subsequent awards may be withheld until the faculty member submits a transcript, grade report or other documents.

OTHER

1. Support for dissertation writing will not be honored unless it can be documented that the student is registered for class. The Title III grant does not usually support extended periods beyond one year of dissertation writing.

2. Financial support is provided only for study beyond the bachelor’s level.

3. Financial support is not provided for a faculty member who matriculates at West Virginia State University.

4. Financial support may be provided one year to pay a part-time instructor substituting for a faculty member who is completing the dissertation. The request must be made to the VPAA and the Title III Director prior to the National Title III deadline.

STAFF DEVELOPMENT

Staff development consists of attending professional development meetings or seminars for professional staff such as short courses on BANNER and other training that may lead to certification.
ASSET MANAGEMENT

CONDITION FOR PERSONAL PROPERTY ASSIGNMENTS

1. Assignment of personal property to an employee carries strict responsibility for the care and protection of such property. If approved, the University will provide All Risk Insurance coverage and charge the premium to the department assigned responsibility for the property.

2. Approval for assignment will be by the department head and the Business and Finance Office. Property may not be removed from campus until final approval is granted.

3. It will be the responsibility of the department head to personally verify that the equipment is located where it is assigned and being used for University business and for University business only. This determination shall be made no less than once per academic year.

4. Annual verification of location and condition of personal property shall be the responsibility of the Business and Finance Office if the property is listed on inventory. This verification shall be made at the Facility Inventory Analyst’s discretion. Verification shall consist of the property being brought to the issuing department or the Office of Business and Finance for inspection, whichever is more practical.

5. If an auditor (State, Federal, etc.) demands to see the property, it will be the responsibility of the employee to immediately deliver the property to campus. If the employee will be unavailable for a period of time, the property must be returned to the department unless arrangements are made with the department head for inspection of property, if required.

6. The employee who has been assigned property for a specific location may not relocate the property without authorization.

7. The employee shall not permit others to use the property unless the use is officially recognized and approved University business.

8. If, through neglect or failure to provide adequate safeguards, this property is lost to the use of the University, the employee may be held responsible for its replacement cost. Further, if the employee has taken home equipment and it is stolen, the employee is completely liable for the replacement cost.

9. Personal use of Corporation property for other than official University business is a violation.

10. If employment is terminated, all Corporation property must be returned to the University in good condition prior to the employee receiving his/her final paycheck.
FREQUENTLY ASKED QUESTIONS

TO ASSIST U.S. DEPARTMENT OF EDUCATION GRANTEES TO APPROPRIATELY USE FEDERAL FUNDS FOR CONFERENCES AND MEETINGS

USING FEDERAL GRANT (DISCRETIONARY AND FORMULA) FUNDS TO HOST A MEETING OR CONFERENCE

1. May a grantee receiving funds from the U.S. Department of Education (Department) use its Federal grant funds to host a meeting or conference?

   Yes. Federal grant funds may be used to host a meeting or conference if doing so is:
   
   • Consistent with its approved application or plan;
   • For purposes that are directly relevant to the program and the operation of the grant, such as for conveying technical information related to the objectives of the grant; and
   • Reasonable and necessary to achieve the goals and objectives of the approved grant.

2. What are examples of “technical information” that may be conveyed at a meeting or conference?

   Examples of technical information include, but are not limited to, the following, each of which must be related to implementing the program or project funded by the grant:
   
   • Specific programmatic, administrative or fiscal accountability requirements;
   • Best practices in a particular field;
   • Theoretical, empirical or methodological advances in a particular field;
   • Effective methods of training or professional development; and
   • Effective grant management and accountability

3. What factors should a grantee consider when deciding whether to host a meeting or conference?

   Grantees should consider whether a face-to-face meeting or conference is the most effective or efficient way to achieve the desired result and whether there are alternatives, such as webinars or video conferences, that would be equally or similarly effective and more efficient in terms of time and costs than a face-to-face meeting. In addition, grantees should consider how the meeting or conference will be perceived by the public; for example, will the meeting or conference be perceived as a good use of taxpayer dollars?

4. Are there conflict-of-interest rules that grantees should follow when selecting vendors, such as logistics contractors, to help with a meeting or conference?

   Grantees, other than States, must, as appropriate, comply with the minimum requirements in 34 CFR 74.42 and 80.36(b)(3) and should follow their own policies and procedures (or their local or State policies, as applicable) for ensuring that there are no conflicts of interest in the procurement process.
5. When a meeting or conference is hosted by a grantee and charged to a Federal grant, may the meeting or conference be promoted as a U.S. Department of Education event?

No. Meetings and conferences hosted by grantees are directed by the grantee, not the U.S. Department of Education. Therefore, the meeting or conference may not be promoted as a U.S. Department of Education meeting or conference, and the seal of the U.S. Department of Education must not be used on conference materials or signage without Department approval. In addition, all meeting or conference materials paid for with Federal grant funds must include appropriate disclaimers, such as the following, which is provided in EDGAR § 75.620 and states:

The contents of this (insert type of publication; e.g., book, report, film) were developed under a grant from the U.S. Department of Education. However, those contents do not necessarily represent the policy of the U.S. Department of Education, and you should not assume endorsement by the Federal Government.

USING FEDERAL GRANT FUNDS TO PAY FOR FOOD

6. When a grantee is hosting a meeting, may the grantee use Federal grant funds to pay for food, beverages or snacks?

Generally, there is a very high burden of proof to show that paying for food and beverages with Federal funds is necessary to meet the goals and objectives of a Federal grant. When a grantee is hosting a meeting, the grantee should structure the agenda for the meeting so that there is time for participants to purchase their own food, beverages and snacks. In addition, when planning a meeting, grantees may want to consider a location in which participants have easy access to food and beverages.

While these determinations will be made on a case-by-case basis, and there may be some circumstances where the cost would be permissible, it is likely that those circumstances will be rare. Grantees, therefore, will have to make a compelling case that the unique circumstances they have identified would justify these costs as reasonable and necessary.

If program offices have questions, they should consult with their program attorney.

7. May Federal grant funds be used to pay for food and beverages during a reception or a “networking” session?

In virtually all cases, using grant funds to pay for food and beverages for receptions and “networking” sessions is not justified because participation in such activities is rarely necessary to achieve the purpose of the meeting or conference.

8. May a grantee enter into a contract with a hotel under which Federal grant funds will be used to provide meals, snacks and beverages as part of the cost for meeting rooms and other allowable conference-related costs?

Federal grant funds may only be used for expenses that are reasonable and necessary. In planning a conference or meeting and negotiating with vendors for meeting space and other relevant goods and services, grantees may only pay for allowable costs. If a hotel vendor embeds food and beverage costs into a hotel contract for meeting space, the grantee should work with the hotel to have the food and beverage costs identified and “backed out” of the contract, and have the price they are paying
for meeting space appropriately adjusted to reflect the fact that food and beverages are not being purchased. The fact that food and beverages are embedded in a contract for meeting space does not mean that the food and beverages are being provided at no cost to the grantee.

9. **What if a hotel or other venue provides “complimentary” beverages (e.g., coffee, tea) and there is no charge to the grantee hosting the meeting?**

The grantee has an obligation, under these circumstances, to confirm that the beverages are truly complimentary and will not be reflected as a charge to the grant in another area. For example, many hotels provide complimentary beverages to all guests who attend a meeting at their facility without reflecting the costs of those beverages in other items that their guests or, in this case, the grantee purchases. As noted above, it would not be acceptable for a vendor to embed the cost of beverages in other costs, such as meeting space.

10. **May indirect cost funds be used to pay for food and beverages?**

The cost of food and beverages, because they are easily associated with a specific cost objective, such as a Department grant, are properly treated as direct costs, rather than indirect costs. As noted above, Federal grant funds cannot be used to pay for food and beverages unless doing so is reasonable and necessary.

11. **May Federal grant funds be used to pay for alcoholic beverages?**

No. Use of Federal grant funds to pay for the cost of alcoholic beverages is strictly prohibited.

12. **May a grantee use non-Federal resources (e.g., State or local resources) to pay for food or beverages at a meeting or conference that is being held to meet the goals and objectives of its grant?**

Grantees should follow their own policies and procedures and State and local law for using non-Federal resources to pay for food or beverages, including its policies and procedures for accepting gifts or in-kind contributions from third parties. However, if non-Federal funds are used to pay for food at a grantee-sponsored meeting or conference, the grantee should make clear through a written disclaimer or announcement (e.g., a note on the agenda for the meeting) that Federal grant funds were not used to pay for the cost of the food or beverages. Grantees should also be sure that any food and beverages provided with non-Federal funds are appropriate for the grantee event and do not detract from the event’s purpose.

13. **May grantees provide meeting participants with the option of paying for food and beverages (e.g., could a grantee have boxed lunches provided at cost for participants)?**

Yes. Grantees may offer meeting participants the option of paying for food (such as lunch, breakfast or snacks) and beverages, and arrange for these items to be available at the meeting.
14. May grantees use Federal grant funds to pay for the cost of attending a meeting or conference?
If attending a meeting or conference is necessary to achieve the goals and objectives of the grant, and if the expenses are reasonable (based on the grantee’s own policies and procedures, and State and local laws), Federal grant funds may be used to pay for travel expenses of grantee employees, consultants or experts to attend a meeting or conference. To determine whether a meeting or conference is “necessary,” grantees should consider whether the goals and objectives of the grant can be achieved without the meeting or conference and whether there is an equally effective and more efficient way (in terms of time and money) to achieve the goals and objectives of the grant (see question #3). To determine whether the expenses are “reasonable,” grantees should consider how the costs (e.g., lodging, travel, registration fees) compare with other similar events and whether the public would view the expenses as a worthwhile use of Federal funds.

15. What should a grantee consider when planning to use Federal grant funds for attending a meeting or conference?
Among other considerations, grantees should consider how many people should attend a meeting or conference on its behalf. The number of attendees should be reasonable and necessary to accomplish the goals and objectives of the grant. The grantee should also determine whether it is necessary to attend the entire meeting or conference, or whether attending only a portion of the meeting or conference is reasonable and necessary.

16. What travel expenses may be paid for with Federal grant funds?
Grantees may use Federal grant funds for travel expenses only to the extent such costs are reasonable and necessary and do not exceed charges normally allowed by the grantee in its regular operations consistent with its written travel policies. In the absence of an acceptable written policy regarding travel costs, grantees must follow the Federal travel and subsistence rates established by the General Services Administration. 48 CFR 31.205-46(a) established under subchapter I of Chapter 57, Title 5, United States Code (“Travel and Subsistence Expenses; Mileage Allowances”). Federal grant funds may be used to pay expenses for transportation, per diem and lodging if the costs are reasonable and necessary. Grantees should follow their own travel and per diem rules and costs when charging travel expenses to their Federal grant. As noted in the cost principles, grantees that do not have travel policies must follow:

…the rates and amounts established under subchapter I of Chapter 57, Title 5, United States Code (“Travel and Subsistence Expenses; Mileage Allowances”), or by the Administrator of General Services, or by the President (or his or her designee) pursuant to any provisions of such subchapter shall apply to travel under sponsored agreements (48 CFR 31.205-46(a)).

See 2 CFR Parts 220, 225, and 230.

Questions Regarding the Allowable Use of Federal Grant Funds

38 TITLE III PROGRAMS MANUAL
17. What resources are available to help grantees determine whether costs associated with meetings and conferences are reasonable and necessary?
Grantees must follow all applicable statutory and regulatory requirements in determining whether costs are reasonable and necessary, especially the U.S. Office of Management and Budget’s Cost Principles for Federal grants that are set out at:

18. May Federal grant funds be used to pay for entertainment?
Federal grant funds may not be used to pay for entertainment, which includes costs for amusement, diversion and social activities.

19. Is it allowable for a person whose travel costs are being paid with Federal grant funds to attend a conference in Washington, DC, and lobby members of Congress while in town?
Appropriated funds may not, except under very limited circumstances, be used for expenses related to any activity designed to influence the enactment of legislation, appropriations, regulations, administrative actions or Executive Orders proposed or pending before the Congress or the Administration. To the extent that a portion of time at a conference is spent on lobbying activities, costs associated with the lobbying, including transportation to and from Washington, DC, lodging and per diem, may not be charged to the Federal grant. For example, if a meeting or conference lasts for two days and a visit to lobby a member of Congress requires an additional day of travel, 1/3 of all costs involved in attending the meeting or conference, including travel to and from Washington, DC, may not be charged to the grant.

20. What are the consequences of using Federal grant funds on unallowable expenses?
The Department may seek to recover any Federal grant funds identified, in an audit or through program monitoring, as having been used for unallowable costs, including unallowable conference expenses.

21. Whom should grantees call if they have specific questions about the allowable use of Federal grant funds?
Grantees are encouraged to contact their U.S. Department of Education program officer to discuss the allowable use of Federal grant funds, including the allowable use of Federal grant funds for meetings and conferences.

2 CFR Part 230 (Cost Principles for Non-Profit Organizations), Appendix B., 25(b) and 2 CFR Part 220 (Cost Principles for Educational Institutions), 28(b).
APPENDIX

The following questions were submitted by University Title III Project Coordinators of other HBCUs, staff of the Division of Institutional Development (DID), and by the Office of Grant and Contracts Services (GCS). The answers are based on provisions contained in the Program Regulations (34CFR 608 and 609).

Q1: Should Time and Effort reports be maintained for personnel participating in Title III if institutional policy does not require such reports?
A1: Grantees are encouraged to review thoroughly the provisions contained in EDGAR, Part 4, Appendix D, J, 7 for a full description of the standards applied in establishing the allowability of costs for compensation for personal services. These standards indicate that a grantee must maintain documentation to support its payroll distribution systems for charges to the grant for personal services, except charges for stipulated salary support. Title III grantees should not assume that salaries allowed under the grant qualify as stipulated salary support; they probably do not.

Q2: Are costs for entertainment and/or speakers allowable under the Title III HBCU program?
A2: Costs for entertainment are unallowable by EDGAR (34, CFR 74, Appendix D, 12). However, costs for cultural activities (which may also entertain an audience) that are specifically related to strengthening the academic program and/or to assisting students in successfully completing academic requirements are allowable. Appropriate documentation is needed to ensure compliance: e.g., students’ evaluations/reactions to cultural exposures tied to course objectives and required for successful completion of coursework or programs of study.

Q3: Can a grantee be allowed to spend funds before the new fiscal year begins (October 1st) for an activity that is slated to begin in August of that year?
A3: Yes. Both Part 74 and Part 80 incorporated by reference OMB circular A 21, A 87, and A 122, govern allowable expenditures under most grant awards, thus giving them the force of law. The relevant circulars allow grantees to expend funds before the effective date of the award only with the prior approval of the awarding agency. Therefore, a grantee may spend money three months prior to the effective date of the continuation award.

Q4: What is the procedure for submitting requests for revisions and transfers of funds under the new legislation?
A4: The new legislation did not change the procedures. The requests should be addressed to your grants specialists. You must include your award number on all correspondence. The grantee must justify the reason(s) for the change and the appropriate budget breakdown associated with it. The request should be submitted at least 30 days prior to the requested effective date.
Q5: Can Title III funds awarded under the Undergraduate HBCU program be used for allowable activities in the Graduate Program?
A5: No. Funds awarded under the HBCU Program may not be used to fund allowable activities in the Graduate Program.

Q6: Can students be paid out of Title III/HBCU funds to perform needed project tasks?
A6: There is no specific statutory or regulatory guidance on payment to students to perform project tasks. However, the EDGAR regulations stipulate that costs shall be reasonable and consistent with established institutional policies and practices applicable to the work of the institution generally (34 CFR, 74, Appendix D, C, 2). Student employment must be justified and necessary to meet activity objectives. Student employment should also be based on appropriate selection criteria and qualifications to carry out project tasks, if requested for Title III approval.

Q7: What budget revision and programmatic changes require prior approval?
A7: The following budget revisions require prior written approval: (1) to transfer amounts budgeted for indirect costs, (2) to transfer amounts budgeted for student support (tuition/stipends/fees), (3) to establish new line items, and (4) if a grant provides support for both construction and non-construction work, then prior approval is required before any budget transfers between the two types of work can occur.

EDGAR 74.103 requires prior approval for the following programmatic changes: (1) changes to project scope or objectives, (2) changes in key personnel, and (3) to continue the project for more than three (3) months without the direction of a project director. Under EDGAR, these are the only programmatic changes that require prior approval.

Q8: What is meant by financial and compliance audit?
A8: When an approved recipient accepts funds under federally assisted programs, the recipient assumes the responsibility for carrying out the programs efficiently, economically and effectively, as well as assuming responsibility for auditing financial operations.

The financial and compliance audits are those which, at a minimum, examine the recipient’s systems of internal control, which insures compliance with laws and regulations affecting the expenditure of funds, financial transactions and accounts, and financial statements and reports of the recipient’s organization.

The U.S. General Accounting office has published a booklet, Guidelines for Financial and Compliance Audits of the Federally Assisted Programs. This booklet may be obtained from the Superintendent of Documents, U.S. Government Printing office. The Education Department does not stock this document for distribution.
FREQUENTLY USED FORMS

(To access all current Title III forms, go to wvstateu.edu/administration/title-iii-plan-b.aspx)