TITLE	GRANTS MANAGEMENT	NUMBER
		2.04
AUTHORITY	CENTRAL CAROLINA TECHNICAL COLLEGE	DATE
		April 23, 2019
OFFICE OF RESPONSIBILITY	VICE PRESIDENT FOR BUSINESS AFFAIRS	SIGNATURE

I. POLICY

It is the policy of Central Carolina Technical College to administer all external grant funds in compliance with applicable laws, regulations, donor restrictions, and other requirements. The College will follow all state procurement, disbursement, equipment, and personnel regulations regardless of the funding source.

II. PROCEDURE

A. Program Management

The Project Director is responsible for all aspects of administration and completion of a funded project, including implementation, management, progress reporting, compliance, and evaluation of the grant. The Project Director is expected to discharge this responsibility in accordance with the College's existing policies, procedures and practices and in accord with the funder's regulations, requirements, and contractual terms. The Project Director must relate financial data to performance as well as demonstrate cost effective practices. If a Project Director is not included in the scope of the budget for a grant, the Vice President in the content area of the grant award will identify this person.

The appropriate Vice President, Dean or other administrator is central to the review and approval process and continues to play a vital role in implementing and managing an externally-funded project. Primary responsibilities of the appropriate administrator include the following: (1) ensuring the resolution of any potential conflicts of interest prior to grant implementation; (2) conducting an initial meeting with the Project Director to review plans for implementing the project to ensure that all activities can and will be accomplished in the approved budget period; (3) establishing with the Project Director a schedule of regular progress review meetings; and (4) conducting a project completion and close-out meeting approximately thirty to sixty days prior to the project end date to ensure compliance with all close-out regulations.

Budget modifications must be requested by the Project Director and approved by the grantor agency (if required) before budget transfers may be made. Modifications must be in accordance with grant guidelines.

B. Financial Management

1. The Accounting Office is responsible for the following: (1) maintaining a financial management system that meets the conditions and requirements established by the federal Office of Management and Budget (OMB) for federal funds or meets requirements of other agencies in the instance of state, local or private grant awards, (2) processing all purchase orders and contracts consistent with established State and College policies, procedures and practices, and (3) developing appropriate financial reports for all grants/externally funded projects. For federally funded projects, procurement transactions are completed in accordance with applicable federal requirements and in compliance with the South Carolina Consolidated Procurement Code and Regulations.

   Each grant will be accounted for separately in an individual grant account on the College's Banner finance system. Each grant account will report actual and budgeted expenditures by line item. Grant funds will be expended according to grant guidelines. Documentation will be sufficient to prepare reports as required by the grantor. The College will be able to trace funds to an adequate level of expenditure as established by the grantor. A separate file will be maintained in the Accounting Office for each grant that includes all financial reports and supporting documentation, such as invoices and Salary Certification Forms (see below).

   Cash Management - Grant reimbursements will be processed on a monthly or quarterly basis. The draw of federal funds will be processed after approval of the reimbursement report. The prior month and/or quarterly draw will be based on actual expenses incurred by the grant.

   Cost Allocation – most costs will be charged directly to the grant. Those that must be allocated, such as telephone, copies, vehicle expense and academic computing will be allocated based on actual usage. Costs charged to grants must be reasonable and necessary for the operation of the program.

   Separation of Duties – effective controls will be in place to safeguard grant purchases to prevent unauthorized purchases and disbursement of grant assets. There will be an approval process in place to ensure the person making the purchase has received prior approval and that the purchase is aligned with the grant agreement.

2. Any compensation paid to any employee from an external grant or contract must conform to the State Office of Human Resources regulations, and the policies and procedures of the South Carolina Technical College System and

the College. The Human Resources (HR) Office assists with advertising for positions and completion of hiring transactions for grant-funded staff. The HR Office is responsible for informing all personnel paid through grant funds of applicable HR policies.

In addition to following all other State and College policies and procedures, employees in permanent or temporary grant positions, paid in full or partially by grants are required to complete a monthly Salary Certification Form (Attachment 1) indicating the percentage of effort spent on the grant, which will be used for time and effort reporting. This form is to be signed by the employee and supervisor and sent to the Accounting Office each month. This form is a record that reflects the actual work performed. The Salary Certification form will not exceed 100% of compensated activities of both federal and non-federal funds. Internal controls will be in place to provide reasonable assurance that the charges to grants are allowable and properly allocated. Temporary contract employees may complete this form or may use their temporary contract and timesheet as certification of percentage of effort spent on the grant.

The College payroll system is both a time and effort reporting system. Under federal regulations on effort reporting, 100% effort is an employee's total hours actually spent on work within the scope of his or her employment regardless of how many or how few hours an employee works and regardless of the percent FTE listed. Effort reporting must reflect actual work performed and cannot be budget driven.

Time and Effort tracking are reported in these ways at the College:

- The HR department enters the appropriate grant labor distribution on the grant personnel's' assigned positions to reflect the planned labor effort.
- Payroll timesheets are a means to verify that positions are properly charged and effort reporting is enhanced.
- Salary Certification forms are completed and signed by the employees and verified by the supervisors' signatures monthly and confirmed by the accounting office to be in agreement with the labor distribution.

3. If a subaward is made as a part of a grant, the College must obtain a subaward agreement with the subrecipient that outlines the College's monitoring policies and procedures. These procedures will ensure the subrecipient follows the same procedures as the College as outlined above.

4. Indirect costs will be claimed for federal grants as allowed by the grantor agency. The College will maintain a current indirect cost agreement with the Department of Health and Human Services.