



Title III, Parts B & F “Strengthening Historically Black Colleges and Universities Program Policies and Procedures Manual”



Title III, Parts B & F

Spelman College

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THE TITLE III PROGRAM

The **Title III** Program is funded under the Higher Education Act of 1965 (HEA), as amended by the Higher Education Amendments of 1986 (and subsequent amendments), Pub. L. 99-498, the Omnibus Budget Reconciliation Act of 1986, Pub. L. 99-509, and the Higher Education Technical Amendments Act of 1987, Pub. L. 100-50. Further amendments appear in Pub. L. 100-369.

Uniform Guidance

The Title III Office will operate under the new federal **Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (Uniform Guidance)** regulations effective for all federal awards made after December 26, 2014 as adopted by the College.

The Executive Office of the President, Office of Management and Budget (OMB) is streamlining the Federal government's guidance on Administrative Requirements, Cost Principles, and Audit Requirements for Federal awards. These modifications are a key component of a larger Federal effort to more effectively focus Federal resources on improving performance and outcomes while ensuring the financial integrity of taxpayer dollars in partnership with non-Federal stakeholders. This guidance provides a government wide framework for grants management which will be complemented by additional efforts to strengthen program outcomes through innovative and effective use of grant making models, performance metrics, and evaluation.

This reform of OMB guidance will reduce administrative burden for non-Federal entities receiving Federal awards while reducing the risk of waste, fraud and abuse. This final guidance supersedes and streamlines requirements from OMB Circulars A-21, A-87, A-110, and A-122 (which have been placed in the OMB guidance); Circulars A-89, A-102, and A-133; and the guidance in Circular A-50 on Single Audit Act follow-up.

The final guidance is located in Title 2 of the Code of Federal Regulations. The Uniform Guidance does not broaden the scope of applicability from existing government-wide requirements, affecting Federal awards to non-Federal entities including state and local governments, Indian tribes, institutions of higher education, and nonprofit organizations. Parts of it may also apply to for-profit entities in limited circumstances and to foreign entities as described in this guidance and the Federal Acquisition Regulation.

This guidance does not change or modify any existing statute or guidance otherwise based on any existing statute. This guidance does not supersede any existing or future authority under law or by executive order or the Federal Acquisition Regulation.

Purpose of the Title III Program, Part B

The purpose of the Title III program is to assist eligible institutions in “equalizing educational opportunity through a program of Federal assistance.” Institutions which are eligible under Part B of the Act, the Part under which Spelman College’s Title III Program is funded, are Historically Black Colleges and Universities established prior to 1964 and whose principal mission is the education of Black Americans.

According to CFR 34 Subpart B, Paragraph 608.10, the following activities are allowable and can be carried out under this grant:

- (1) Purchase, rental, or lease of scientific or laboratory equipment for educational purposes, including instructional or research purposes;
- (2) Construction, maintenance, renovation, and improvement in classroom, library, laboratory, and other instructional facilities, including purchase or rental of telecommunications technology equipment or services;
- (3) Support of faculty exchanges, faculty development and faculty fellowships to assist these 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 program materials;
- (6) Tutoring, counseling, and student service programs designed to improve academic success;
- (7) Funds and administrative management, and acquisition of equipment for use in strengthening funds management;
- (8) Joint use of facilities, such as laboratories and libraries;
- (9) Establishing or improving a development office to strengthen or improve contributions from alumni and the private sector;
- (10) Establishing or enhancing a program of teacher education designed to qualify students to teach in a public elementary or secondary school in the State that shall include, as part of the program, preparation for teacher certification;
- (11) Establishing community outreach programs that will encourage elementary and secondary students to develop the academic skills and the interest to pursue postsecondary education;

- (12) Establishing or improving an endowment fund;
- (13) Acquisition of real property in connection with the construction, renovation, or addition to or improvement of campus facilities;
- (14) Education or financial information designed to improve the financial literacy and economic literacy of students or the students' families, especially with regard to student indebtedness and student assistance programs;
- (15) Services necessary for the implementation of projects or activities that are described in the grant application and that are approved, in advance, by the Secretary, except that not more than two percent of the grant amount may be used for this purpose;
- (16) Other activities proposed in the application submitted pursuant to section 1063a of this title that—
 - (A) contribute to carrying out the purposes of this part; and
 - (B) are approved by the Secretary as part of the review and acceptance of such application.

Additionally, CFR 34 Subpart B, Paragraph 608.10, states the following activities are unallowable and cannot be carried out under this grant:

- (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; and
- (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.

Purpose of the Title III Program, Part F

Title III, Part F of the Higher Education Act of 1965, as amended, provides an additional \$85 million annually until fiscal year 2019 for the Title III, Part B Historically Black Colleges and Universities (HBCU) program (SAFRA, Part F). Beginning with FY10, these mandatory funds are to be added to any amount appropriated in a regular or supplemental appropriation act for the Title III, Part B Strengthening HBCU Program.

HBCUs are required to submit a new application to address the additional funding. The Comprehensive Development Plan (CDP) includes the five year plan. The Phase II Reports are submitted annually with the exception of year one of the plan. The same data submitted in response to the Phase I Formula Data will be used to calculate awards for this additional funding.

Applicants are required to submit a project abstract. The project abstract is limited to one page, single-spaced. The project abstract must include information about the institution's proposed five-year project, providing a brief summary of the proposed activities and how they will address the goals and objectives of the Title III, Part F Program, with priority given to the following legislative allowable activities:

- (1) Purchase, rental, or lease of scientific or laboratory equipment for educational purposes, including instructional and research purposes;
- (2) Construction, maintenance, renovation, and improvement in classroom, library, laboratory, and other instructional facilities, including purchase or rental of telecommunications technology equipment or services;
- (3) Academic instruction in disciplines in which Black Americans are underrepresented;
- (4) Purchase of library books, periodicals, microfilm, and other educational materials, including telecommunications program materials;
- (5) Establishing or enhancing a program of teacher education designed to qualify students to teach in a public elementary or secondary school in the State that shall include, as part of such program, preparation for teacher certification; and
- (6) Other activities, consistent with the institution's comprehensive plan and designed to increase the institutions capacity to prepare students for careers in the physical or natural sciences, mathematics, computer science or information technology or sciences, engineering, language instruction in the less-commonly taught languages or international affairs, or nursing or allied health professions.

Note: Endowment funding is not an allowable activity under the 5-year HBCU Mandatory Funds Program.

Title III funds may be spent only on activities that are included in the approved Comprehensive Development Plan (CDP). The Comprehensive Development Plan must give a description of the activities to be carried out; and it must show how grant funds will be used to supplement, and to the extent possible, increase the funds that would otherwise be made available for the activities to be carried out in the grant. **In no case may Title III funds take the place of funds that would otherwise be available.** The Office of Management and Budget's Uniform Administrative Requirements, Cost principles, and Audit Requirements

for Federal Awards, Title 2 of the Code of Federal Regulations (CFR) Part 200 (Uniform Guidance), list other non-allowable expenditures. Some of these are referenced in later parts of this manual.

Relation of Title III Activities to the Mission of the College

All Title III activities must support the mission and goals of the College. The institutional mission statement identifies certain distinguishing characteristics of the students the College proposes to serve and the programs of study it proposes to offer. **The Title III activities must address major weaknesses that inhibit the institution from realizing its mission as identified by the College's Strategic Plan.**

How Title III Funds Are Allocated

Funds are allocated by a formula which is based upon the number of Pell Grant recipients at the institution, the number of bachelor's degree recipients of the institution, and the number of students who graduated from the institution who have been admitted to and are in attendance in graduate or professional schools in a degree program or discipline in which Blacks are underrepresented.

The Grant Allocation Formula

1. Number of Pell Grant recipients at the College during the school year immediately preceding the year of application x 50% of appropriations
Number of Pell Grant recipients at all applicant institutions during the school year immediately preceding the year of application
2. Number of graduates at the College during the school year immediately preceding the year of application x 25% of appropriations
Number of graduates of the College during the school year immediately preceding the year of application
3. Percentage of graduates, who within five years of graduating with baccalaureate degrees, are in attendance at graduate or professional schools and enrolled in degree programs in disciplines in which Blacks are underrepresented x 25% of appropriations. The sum of the percentages of those graduates of all applicant institutions
4. Add the amounts obtained in 1, 2, and 3.

Eligibility for Continuation Funds

Once the College receives a five-year Title III grant, the Department of Education will consider continued funding of the application if (1) funds are available, (2) the Department determines that continuing the project would be in the best interest of the government, and (3) the recipient shows satisfactory progress toward the goals of the project and submits a continuation application.

TITLE III PERSONNEL

Title III personnel consist of the Chief of Staff and Associate Vice President for Title III & Government Relations, Title III Program Coordinators, Data Specialist & Sr. Administrative Assistant, the Office of the Controller and the Office of Budgets and Contracts.

Title III, Part B Activities

The following activities are included in the Comprehensive Development Plan for the Strengthening HBCUs Program Part B for 2012-2017:

1. Enhancing Academic and Administrative Technology Services
2. Enhance Academic Programs in STEM
3. Professional Collaboration to Enhance Faculty Development
4. Faculty Development in Integrative Teaching and Assessment
5. Enhancing Tutoring and Student Academic Support Programs

Activities 3 and 4 were combined in 2015-2016 to create Activity 4, Professional Collaboration: Integrative Teaching and Assessment.

Title III, Part F Activities

The following activities are included in the Comprehensive Development Plan for Strengthening HBCUs Program Part F (SAFRA) for 2015-2020:

1. Enhancing Faculty Internationalization
2. Infusing STEM with STEAM: Enhancing Interdisciplinarity in STEM Instruction
3. Enhance the Development of Research and Clinical Training in the Health Sciences

A section for Project Administration and Evaluation is included in both Comprehensive Development Plans.

SPELMAN COLLEGE TITLE III OFFICE ROLES/EXPECTATIONS

The Title III Office serves as the administrative unit for the HBCU program. The primary goal is to ensure that the institution remains in compliance with federal regulations and informs the President and the

Spelman Title III community of the latest trends affecting the use of Title III funds received from the United States Department of Education.

TITLE III OFFICE ROLES/EXPECTATIONS

Organizational Objective

To ensure Title III funds are utilized to strengthen the academic and administrative services of Spelman College and provide effective management of the Title III funds in accordance with the regulations in Title 2 CFR.200 (Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards).

Staff

The Title III Office has a Data Specialist/Sr. Administrative Assistant at 50% (B), an Associate Vice President for Title III (AVP) at 40% (B) and, two Title III Program Coordinators, one at 100% (B) and the second at 100% (SAFRA), responsible for assisting the AVP with the coordination of the effective implementation of the Title III activities, and are also responsible for coordinating all budget activities for the Title III HBCU Grants. The AVP has oversight of the program and works closely with the President, Provost and Vice President for Academic Affairs and the Vice President for Business and Financial Affairs to ensure compliance and effective and efficient management of the grants. The Data Specialist/Sr. Administrative Assistant serves as administrative support for the Title III Program. Also, this position collects data for various reports and is responsible for the data entered into the required software for electronic report submission. The incumbent ensures that the reports are filed in the appropriate electronic and manual binder/folder.

Management and Compliance

All Title III Activities will be evaluated no less than bi-annual by assessing the impact of spending to support program initiatives and by comparing the stated measurable objectives with the achieved outcomes.

The following visits will be conducted and reports generated:

1. Bi-annual Reviews to include the following:
 - a. Budget review

- b. Progress of Activity (measureable objectives and outcomes)
- c. Inventory review
- d. Internal evaluation

2. Reports

- a. **Budget Summary reports will be electronically sent to the Activity Directors monthly for review and reconciliation.**
 - b. **The template for the Activity Progress Report is provided in September of each year and the due dates for the bi-annual reports are April 15th for the period October 1-March 31 and October 15th for the period April 1-September 30. The April 15th Progress Reports submitted by the Directors to the Title III Office will be used to complete the mid-annual review of the performance year for the HBCU and SAFRA grant program expenditures in an effort to prevent excessive carry-over funds into the next fiscal year due to the U. S. Department of Education in August. The October 15th Progress Report submitted by the Activity Directors to the Title III Office will be used to complete the Annual Performance Report due to the U. S. Department of Education in January; therefore, the October 15th report should include the outcomes for all measureable objectives and if possible stated in qualitative and quantitative terms.**
 - c. **The electronic Time and Effort Report Form is to be completed monthly by the faculty and staff persons compensated from Title III funds, signed by the employee and the employee's supervisor; by the tenth (10th) working day following the month the employee was compensated; the electronic form is routed to both the Payroll Office and the Title III Office. Failure to comply with this federal requirement will result in the employee not being compensated. Faculty are required to submit nine Time & Effort forms for the months September – May of each grant award period. All Time & Effort Reports must reflect the daily tasks and activity objectives related to the associated monthly effort of contribution.**
3. It is recommended that external evaluations be conducted annually. In consultation with the President, the Associate Vice President for Title III and & Government Relations will recommend external evaluators to conduct the evaluations.

Training

The main responsibility of the Title III Office staff is to meet the needs of activity directors and support staff by providing guidance on the processes and procedures pertaining to Title III. Specifically, Title III office staff is also responsible for providing support and training for effective management of the Title III funds. The Title III Office will use an external facilitator to assist with one-one-on guidance and support for the Title III activity directors and their staff, as needed.

Annual support and training by the office is inclusive of:

- 1. Streamlining processes for effective management and processing of pertinent Title III forms.
- 2. Attending required meetings to stay abreast of the latest trends affecting Title III.

3. Establishing effective ways to communicate Title III processes, requirements and DOE updates to Administrators, Activity Directors, and support staff.

Note: The Title III Office is not responsible for training activity directors and staff on College policies and procedures.

RESPONSIBILITIES OF SPELMAN COLLEGE TITLE III ACTIVITY DIRECTORS

Title III Activity Directors

Activity Directors are responsible for the overall management and day-to-day operations of the activity. Additionally, activity directors are responsible to the Title III Office for matters related to the procedural and regulatory compliance of the activity. This would include reporting requirements; allowable expenditures, record keeping, and any modifications to the activity budget and objectives. Only activity directors and designated support staff should initiate requests for funds, and the requests must be based upon the approved HBCU B & F budgets.

Activity Directors' responsibilities include:

1. **Maintaining up-to-date records of all expenditures and obligations charged to the activity and request use of funds in a timely manner to ensure that all funds are used annually by May 30.**
2. **Understanding that all funds not encumbered by May 30 annually will be swept and used to support additional projects identified by the Administration.**
3. **Expending 100% of the funds allocated to the activity annually.**
4. **Submitting timely bi-annual progress reports to the Title III Office, and an annual report at the end of each award year that reflects the activities outcomes in qualitative and quantitative results.**
5. **Maintaining up-to-date records and documentation of programmatic achievements of the activity.**
6. **Completing appropriate programmatic reports required by the US Department of Education (USDOE) and the College.**
7. **Attending scheduled trainings for activity directors and support staff.**
8. **Ensuring all vacated and new positions are filled within three (3) months of the separation date and that all Title III funded positions are devoted to the percent of effort designated in the activity towards the accomplishment of the activity goals and objectives.**
9. **Preparing for and participating in required internal and external evaluations, inventory review, and audits.**

10. Ensuring that the Time and Effort Report Form is completed and submitted by the tenth working day of each month after the employee has been compensated to the Title III Office. Ensure that employees paid from the grant, separating from the College, complete and submit a final Time and Effort report.
11. Ensure that all budget requests are submitted to the Title III Office within the timeframes indicated in this manual, and that all documents required to support the request(s) are attached for review.
12. Ensure that all request(s) are approved or denied by the Director of Title III before requesting payment, travel, and/or purchase of supplies, equipment, etc.
13. Ensure that all encumbrances are cleared by the deadlines set by the Title III Office.
14. Submit a one page success story of the activity's achievement annually by November.

FISCAL MANAGEMENT PERSONNEL

For all Title III positions, there must be a search procedure to ensure that the hiring of persons supported by Federal funds is in compliance with all applicable Federal regulations and is within the framework of the Title III Comprehensive Development Plan. Documentation for personnel management is essential and should be kept according to the guidelines that follow.

Hiring of Personnel

Personnel are to be hired in a nondiscriminatory manner according to the provisions of the Faculty and/or Staff Handbook. The Title III Office requires the activity director to provide a résumé and job description for each person who is hired to work under the approved Title III Activity in the grant. Also, a copy of all résumés and job descriptions of persons selected for Title III jobs should be on file with HR, the Activity Director and Title III Director. All regular College hiring procedures will be followed in the hiring of personnel for the Title III grant.

The following procedures should be used to fill Title III positions:

1. Activity completes the appropriate personnel recruitment forms, as required by Human Resources, and forwards the completed form to the proper offices for approval. (**Note: Federal regulations require that the Title III Director or designee sign all documents.**)
2. Office of Human Resources advertises position via requested media.
3. Office of Human Resources reviews all applications and refers to the supervisor only those that meet the qualifications for the position advertised.

4. Activity director interviews the prospective employee(s). (**Note: No applicant should be interviewed before the first three steps have been taken.**)
5. After a potential employee has been selected, HR completes a Personnel Action form and forwards it to the proper offices for approval. (**Note: The new employee must not begin work prior to the processing of this form and the receipt of a letter of employment from HR.**)
6. Employees paid from the Title III grant are employed up to the period stipulated in the grant.

The Title III Office must receive a copy of the credentials of all persons hired with Title III funds. A copy of the employee's employment vita or résumé will serve this purpose.

Employee Separation

When employees leave or are replaced for any reason, the Title III Office must immediately be informed in writing with appropriate documentation. Copies of correspondence, resignation letters and appropriate HR forms will serve this purpose.

Reports of Time and Effort of Employees

The USDOE requires documentation of time spent working on Title III activities by all persons full or partially paid with Title III funds. Employees (faculty and staff) should, therefore, complete the monthly Time & Effort Report Form and submit it electronically to the supervisor for approval with copies to the Payroll Office and to the Title III Director by the tenth (10) working day of the month following that which service was rendered. The Time & Effort Report must be signed by the Supervisor; and copies of the electronic form are routed to the Payroll Office and Title III Office; Instructions for the completion of Time & Effort Reports appear in the Appendix of this manual. **The completed form must show the daily task and activity objective(s) associated with the work performed during the month and the employee must keep proper documentation of the assignments.**

FACULTY COMPENSATION FOR WORK PERFORMED

Federal regulations described in 2 CFR 200.430, Subpart E, Cost Principles, limit the amounts that may be paid for work performed in the grant. The regulations also prohibit payments for intra-college consulting. Faculty stipends will be paid once the research, workshop, and/or assignment has been completed. Summer research stipends may be handled differently if the Activity Director and Supervisor

request that no more than half of the stipend be expended to begin the research. Requests to pay Faculty stipends must have the following documentation: **Purpose; Objectives, Outcomes, and Assessment. A document of the research assignment and/or workshop must accompany the request for payment of the stipend.**

Salary Rates for Academic Year

Charges for work performed in this grant by a faculty member during the academic year must be based on the faculty member's regular compensation for the continuous period, which under the practice of the institution concerned, constitutes the basis of the salary. Charges for work performed during all or any portion of such period is allowable at the base salary rate. In no case will the charge, irrespective of the basis of computation, exceed the proportionate share of the base salary for that period. **Any extra compensation above the base salary for work in the grant during the academic year is based on college policy regarding earnings of faculty. This principle applies to all members of the faculty at the institution.**

Intra-college Consulting

Since intra-college consulting is assumed to be undertaken as a college obligation requiring no compensation in addition to full-time base salary, the principle described above also applies to those who function as consultants or otherwise contribute to a research agreement conducted by another faculty member of the same institution. **However, in unusual cases where consultation is across departmental lines or involves a separate or remote operation, and the work performed by the consultant is in addition to his/her regular departmental load, any charges for such work representing extra compensation above the base salary are allowable provided such consulting arrangement is specifically provided for in the approved application or approved in writing by the USDOE.**

Salary Rates for Periods Outside the Academic Year

Charges for work performed by faculty members on Government research during the summer months or other periods not included in the base salary period will be determined for each faculty member at

a monthly rate not in excess of that which would be applicable under the base salary and will be limited to charges made in accordance with the paragraph above.

REPORTS OF RELEASE TIME FOR COLLEGE EMPLOYEES

The College is required to document the release-time efforts of employees. To avoid supplanting College funds, the College must continue to pay for the work from which an employee is released; and the College must document the funds paid. Faculty and staff who are released from their regular duties to work on the Title III project are subject to the salary limitations described in the "Faculty Handbook."

Travel

Travel with Title III funds is allowable only for travel expenses identified in the approved grant application. Changes in approved travel must be justified and approved. All travel requires pre-approval by the supervisor, Activity Director and Title III Director.

Approval for Travel

Title III personnel who travel with grant funds must submit a Pre-Travel Request Form to the Title III Director **no less than 30 days prior to the actual travel date. Note: Any requests received less than 15 days prior to the travel date if approved will require the traveler to pay all travel expenses in advance and seek reimbursement upon return.** On the travel request, include the total cost of the trip (airfare, taxi fare, registration fees, meals, mileage and lodging). Travel expenses must be limited to only those expenses that are necessary for providing essential services to Spelman College and must be reasonable, necessary and actual. **Travel must be related to achieving the goals and objectives of the specific Title III activity and a summary of the workshop/conference must be attached to the expense report. The summary must indicate how this workshop/conference relates to the accomplishment of the respective activity's measurable objectives and anticipated results. Travel related to presenting at a conference is not allowed. Students are not permitted to travel out of Title III HBCU B or F (SAFRA) funds.**

Note: Documents to support the travel request such as conference agenda, hotel, airfare, etc. should accompany the request. Travel request once approved must be in accordance with the Spelman Travel Policy.

Travel by Public Carrier

Employees who travel by airline or other public carriers have two options for securing tickets: 1) Book through Travel, Inc. (agency on contract with the College) or 2) Personal credit card. All tickets through Travel, Inc. or World Wide Ventures are automatically charged to the College's corporate travel card. Tickets secured by the second option will only be reimbursed after the trip has been completed if the travel was pre-approved by the Title III Office. All international travel for faculty must be approved by the Provost. Tickets for international travel can also be purchased through Travel, Inc. or World Wide Ventures. The Title III Program Coordinator for HBCU B confirms the purchase of the ticket from Title III funds with the Travel agency.

Note: The boarding pass stubs along with a hardcopy of the internet page showing total cost and confirmed service must be attached to the reimbursement voucher.

Meals, Lodging, Registration Fees, and Other Expenses

Meals and Incidentals: Meals and incidental travel expenses are reimbursable only for official business travel outside the traveler's official station. Reimbursement for said expenses will be reimbursed according to the Spelman *Travel Policy*.

Note: Per-diem rates are adjusted to accommodate for travel days and meals that are included in the conference registration costs.

Lodging: The College reimburses actual expenses (receipt required) up to a daily maximum rate plus taxes and surcharges. (See Spelman Travel Policy)

Registration Fees: Travelers can cover registration costs for pre-approved travel by one of the following options:

1) Pay in advance and seek reimbursement upon return with a paid receipt; or 2) Request a college issued purchase order or check. When choosing the latter option, attach a copy of the original registration form to the travel request.

Other Business Expenses: Anticipated charges for business-related phone calls, postage, internet charges, etc. must be itemized on the travel request under "other", and must be charged to the College budget.

Note: A full, written explanation of these charges must be provided and where necessary receipts may be required. Title III funds are not available to cover these expenses. These expenses must be charged to the appropriate college budget.

Mileage: Personal vehicle usage must be approved in advance by the requestor's supervisor and the Title III Office. The rate of reimbursement is provided in the Spelman *Travel Policies*.

Car Rental: Travel guidelines stipulate that rental car reimbursement cost will only be granted for official business. Title III will only approve rental car expenses when the traveler can demonstrate in writing that this mode of travel is more economical than utilizing public transportation to commute between the airport, hotel and conference site. Car rental must be approved in advance by the supervisor and Director of Title III; the original receipt must be attached to the reimbursement voucher.

Travel Advances

In accordance to the *Spelman Travel Policy*, the supervisor and Title III Director will approve travel advances for faculty/staff traveling out of Title III grants.

Note: Advances must be repaid 15 days after the check issuance date.

Out-of-the-Country Travel

Approval for out-of-the-country travel must be obtained from the Provost/Vice President for Academic Affairs office for all faculty. The President approves and overseas travel for Vice Presidents, Chief of Staff and Secretary for the College. **Title III restricts out-of-the-country travel to trips that have been included and approved in the original proposal submission. All exceptions must be justified and approved by the USDOE Program Officer.**

Note: Out-of-the-country authorization is required for any travel outside of the 48 states. (Alaska, Hawaii, and U.S. territories are considered out of the country.)

Reimbursements for Approved Travel

After the travel has taken place (within 10 working days), prepare a Travel Reimbursement Form and/or Travel Expense Form. To the form, attach receipts for taxi fares, hotel accommodations, fees, and other reimbursable expenses. No receipts are required for meals. Secure the signature of the Activity

Director, Department Head, and/or the Provost, and submit the package to the Title III Director. **The package must include a brief summary of the purpose for the travel and the impact on Activity related objectives and outcomes.**

Note: A copy of the conference itinerary, registration form, and summary of the workshop/conference must accompany the Travel Reimbursement/Travel Expense Form.

EQUIPMENT

Equipment is nonexpendable tangible personal property (including information technology systems) which has an acquisition cost of \$5,000 or more per unit and a useful life of more than one year (2 CFR 200.33).

Note: Spelman Title III policy recommends that items of this nature are acquired during the first quarter of the grant year. (See College Purchasing Policy) Equipment must be purchased during the first 5 months of the grant period (October 1 – March 1).

Acquisition of Equipment and other Facilities

The cost of permanent equipment or other facilities is allowable where such purchases are approved by the Sponsoring Agency concerned or provided for by the terms of the research agreement. Total expenditures for permanent equipment may not exceed 10 percent of the amount allotted for the permanent equipment category by the sponsoring agency and must be listed in the budget for purchase (through an approved budget or other document) with approval.

General Purpose Equipment

Approval must be obtained to acquire with Government funds any general purpose permanent equipment, i.e., any items which are usable for activities of the institution other than research, such as office equipment and furnishings, air conditioning, reproduction or printing equipment, motor vehicles, etc. or any automatic data processing equipment.

Note: It is in the best interest of the College to purchase office furnishings, air conditioning, and motor vehicles with departmental (college) funds.

Limitations on Purchase of Equipment

Only items listed in the final approved Comprehensive Development Plan can be purchased without further approval by the USDOE. To order equipment included in the approved final plan, complete a requisition for purchase according to the instructions listed under procurement.

USDOE Equipment Management Requirements (Uniform Guidance 2 CFR 200.313)

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

(a) Property records shall be maintained accurately. (Retention and access requirements for these records are explained in Subpart D of the *Education Department General Administrative Regulations*. For each item of equipment, the records shall include:

1. A description of the equipment, including the manufacturer's model number, if any.
2. An identification number.
3. Identification of the grant under which the recipient acquired the equipment.
4. The information needed to calculate the Federal share of the equipment
5. Acquisition date and unit acquisition cost.
6. Location, use, and condition of the equipment and the date the information was reported. All pertinent information on the ultimate transfer, replacement, or disposition of the equipment. **Disposition** must be approved by the USDOE Program Officer.

(b) A physical inventory of equipment shall be taken and the results reconciled with the property records at least once every two years to verify 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 causes of the differences.

(c) A control system shall be in effect to insure adequate safeguards to prevent loss, damage, or theft of the equipment. Any loss, damage, or theft of equipment shall be investigated and fully documented.

(d) Adequate maintenance procedures shall be implemented to keep the equipment in good condition.

(e) Where equipment is to be sold, the Federal Government is to have a right to part or all of the proceeds; selling procedures shall be established which will provide for competition to the extent practicable and will result in the highest possible return.

Title III/College Inventory Guidelines

Activity Directors, department heads and administrative unit heads will be responsible for acquisition and care of assigned equipment. Any acquisition, disposal, or transfer of equipment should be promptly approved by the Director of Title III and reported to the responsible person in MIT or the Title III office.

Property Disposition must be approved by the USDOE Program Office.

The College will maintain an inventory of all land, buildings and equipment and all equipment purchased with federal funds. Microcomputers, laser printers, LCD projectors, digital cameras, laptop computers, firearms, and palm pilots, regardless of cost, will be included in the inventory. The records maintained by the Title III Office of equipment purchases made with Title III funds will be reconciled with the College's Asset Management System in April and October, annually.

Procedures for the Acquisition of New Equipment

When an activity acquires new equipment under a Title III grant, it is required to:

- Affix a Title III identification tag to the purchased item; Identification tags are available from the Title III Office.
- Complete the top section of the *Title III Equipment Acquisition and Disposition Form*.

Note: For any section that cannot be completed at the time of submission, indicate TBD (To Be Determined) and submit an updated document to the Title III Director once the information is available.

- Submit completed document to the Title III Director within 10 days of receipt of equipment.

Procedures for Disposal of Fixed Assets

Selling, trading or deleting from the inventory any item of college owned or non-owned equipment is not within a department heads' authority. This responsibility and authority has been assigned to the Vice President of Business and Financial Affairs. This policy also applies to the disposal of the scrap, salvage, broken or obsolete equipment and surplus supplies. In connection with every cash sale of college equipment,

the Vice President of Business and Financial Affairs shall publicly advertise the sale of the equipment and secure at least 3 bids in writing. The equipment will be sold to the highest bidder.

Surplus Equipment

When disposing of equipment that becomes obsolete or is no longer in usable condition, the activity is to follow the procedure below:

- Complete the top and bottom sections of the *Title III Equipment Acquisition and Disposition Form*; For items purchased utilizing unobligated funds, include the year of purchase and both the activity account number and the unobligated account number.)
- Obtain the appropriate authorizations from Department Head and Activity Director; Send the properly authorized document to the Title III Office for approval; Property cannot be **disposed** until the USDOE grants permission.
- Once the permission has been granted by the USDOE, a copy of the completed document will be returned to the department and the original maintained for the Title III official files. The department is then responsible for completing the Controller's Office *Inventory Change and Property Disposition Form* and contacting Facilities Management Services (FMS) to schedule a pickup for the items to be disposed.
- Send the Title III Office a copy of the Inventory Change and Property Disposition Form approved by the Controller's Office and copies of all subsequent documentation requested by the Controller's Office confirming the disposal of the item.

Lost or Stolen Equipment

Equipment that is lost or stolen should be reported on the *Title III Equipment Acquisition and Disposition Form*. Additionally, for lost or stolen equipment, the activity is requested to submit a copy of the police report to the Title III Director and the Office of the Controller no later than three days after the report has been filed with campus safety. This report should include all pertinent information, such as: budget account number, Spelman ID number, serial number, and date of theft.

Loans and Transfers

Equipment is approved for use of requisitioning activity only and should be moved only if the activity is being moved to a different location. The Title III Director maintains responsibility for information on the location and use of all equipment purchased with Title III funds. Each activity is requested to:

- Complete a *Title III Equipment Acquisition and Disposition Form* to request loan or transfer of equipment from one department to another or to remove Title III property from the campus.

- Submit the completed document to the Title III Office for approval prior to the transfer or the removal of equipment from campus. Items on loan from other agencies or organizations are not included in the inventory.

Identification of Equipment Purchased with Title III Funds

All equipment purchased with Title III funds must be identified with a *Purchased through Title III Funds* identification tag that is supplied by the Title III Office. Additionally, all equipment acquired with Title III funds must be available for inspection by the Title III Office, external evaluators, and persons making site visits for the United States Department of Education.

Note: Please remember to retain a copy of all forms submitted to the Title III Director for your official records.

Title III/College Inventory Guidelines for Computer and Educational Technology Supplies

Requisitions for the purchase of all computer and educational technology purchased with Title III funds must use the MIT Ship To code of MITIC. Upon receipt of the equipment, MIT affixes a Title III *identification* tag to the item and enters the purchase into the MIT inventory control **system**. **There is no need for the purchaser to complete and send a form to the Title III Office.**

For Computer and Educational Technology equipment tracked in the MIT inventory control system, to initiate the reporting of items loss or stolen, to request to transfer an item to another location or to request disposition of the item you must complete MIT's online *Inventory Change and Disposition Form* found in Lotus Notes by selecting the Office of the President (Category) and Title III Administration FY13-17 (Application.) Additionally, for lost or stolen equipment, the activity must also submit a copy of the police report to the Title III Director and the Office of the Controller no later than three days after report has been filed with campus safety, as well as complete and submit a *Title III Equipment Acquisition and Disposition* Form containing all the specified information to the Title III Office.

SUPPLIES

“Supplies” means all tangible personal property other than equipment.

Acquisition of Supplies

Grantees should purchase supplies from Title III funds only in amounts reasonably expected to be required for the performance of the grant. Supplies should be procured on a timely basis to reflect use of the supplies during the period of grant support. Although there is no requirement for accountability for supplies similar to that for equipment, the grantee is expected to maintain those records necessary to support the purchase, receipt, and proper charging of supplies in accordance with *good management practices*. **All supplies must be purchased by the end of the second quarter of the grant period (March 31).**

CONTRACTUAL/OTHER

Lecturer/Speaker/Facilitator

Prior approval is required to use a lecturer, speaker or facilitator other than those identified in the application for Title III funds. To use a lecturer, speaker or facilitator complete the Title III Honorarium/Guest Lecturer/Speaker/Facilitator Service Form and submit the form to Title III Director for approval prior to entry of the requisition. All lecturers, speakers or facilitators must be in accord with the objectives of the grant. If the lecturer, speaker or facilitator is “New: (has never conducted business with Spelman College) a New Vendor Profile (which is an on line profile located on the Administrative Services web page) is required and must be approved before the Purchase Order can be generated.

Vendor/Independent Contractor

Additionally, College policy requires that an Independent Contractor Agreement Forms be completed and submitted with a Banner requisition when Title III funds are used to engage a lecturer/speaker/facilitator for more than one day, vendor or independent contractor.

All requests for the use of lecturers, speakers or facilitators must be submitted to the Title III office by March 31 of each grant period.

Use of College Personnel

College employees cannot be used as **lecturers, speakers, facilitators, vendors or independent contractors** under Title III.

Payment of Fees

All expenses must be included in the fee. The Title III Office will not pay separate travel, lodging or other expenses incurred by **lecturers, speakers, facilitators or independent contractors.**

Standards for Documentation of Use

The following information represents the minimum standards for documentation in support of their use:

1. Evidence that the services are needed and the need cannot be met by direct salaries provided under the grant or by employees of the College.
2. Evidence that a selection process has been employed to secure the most qualified individual available, considering the nature and extent of the services to be required.
3. An approved Independent Contractor's Agreement to be approved stating the "Scope of Work" and submitted to Procurement Services, followed by an approved Banner Requisition.

All budget items not classified as personnel, supplies, travel, contractual, construction/renovation or equipment are included in the budget classification "Other."

WORKSHOP EVALUATION

Title III participants should evaluate the effectiveness of workshops sponsored by the grant. Each workshop participant should be asked to complete an evaluation form. A summary of the evaluation should be retained in the activity's files.

PROGRAMMATIC CHANGES AND BUDGET REVISIONS

The budget plan is the financial expression of the project or program as approved during the award process. It may include either the Federal and non-Federal share, or only the Federal share, depending upon ED requirements. It shall be related to performance for program evaluation purposes whenever appropriate. Recipients are required to report deviations from budget and program plans, and request DOE prior approvals for budget and program plan revisions in accordance with the following:

- Change in the scope or the objective of the project or program.
- Change in a key person specified in the application or award document.

- The absence of more than three months, or a 25 percent reduction in time devoted to the project, by the approved project director or principal investigator.
- Need for additional Federal funding.
- The inclusion, unless waived by the Secretary, of costs that require prior approval in accordance with Uniform Guidance 2 CFR 200308.
- Transfer of funds allotted for personnel, fringes, equipment, and training stipends.
- Unless described in the application and funded in the approved awards, the sub-award, transfer or contracting out of any work under an award.

Recipients are required to acquire approval from the Title III Director for the following deviations:

- Transfer of funds allotted for travel, supplies, contractual, construction, equipment and other;
- Creation of a new line under the above categories; and
- Acquisitions of items that are a part of the above categories, but were not included in the approved budget.

Note: The above deviations are characterized as a budget justification and are limited to one per semester and must be requested by December 1 of the Fall semester and March 31 of the Spring semester. No transfers will be allowed after March 31 of each grant award period.

Requests to USDOE/Title III Director to Redirect the Use of Funds

Requests made to redirect the use of funds should include the below components and follow these guidelines:

1. The budget item to be reduced must be identified and the reduction fully justified.
2. The budget items to be increased must be identified along with the amount of the increase and the amount originally approved. The increase must be fully justified.
3. For DOE requests, the letter of request must be signed by the Director of Title III or an official representative of the institution. A request without the official signature will not be processed.
4. The request must be received at least 60 days prior to the expected implementation date.

Budget Revisions

Budget revisions/justifications that require transfer of funds among College budget categories should be prepared on a Budget Line Adjustment form. Budget Line Adjustments should accompany budget justifications or revision requests. Budget revisions/justifications should be made in accordance with the Programmatic Changes and Budget Revisions explained in this manual.

ENTERTAINMENT EXPENSES

Federal funds cannot be used for reimbursement of expenses for entertaining (such as award banquets and competitions). Any costs incurred for amusement, social activities, and any items relating thereto, such as meals, lodging, rentals, transportation, and gratuities, are not allowable.

PROCUREMENT POLICIES

The College's procurement policy and procedures have been revised to bring them in compliance with the new Uniform Guidance regulations implemented by the federal government effective for grant awards made after December 26, 2014. In order to obtain the properties and services needed to carry out the objectives of your activity, follow the College's policies and procedures. Any deviation might result in delays in acquiring what is needed. Some of the policies and procedures are described in the paragraphs that follow.

SPELMAN COLLEGE PROCUREMENT POLICIES AND PROCEDURES For RESTRICTED (GRANT) AND NON-RESTRICTED (COLLEGE) FUNDS

In conformity with the Office of Management and Budgets federal guidelines for procurement (2 CFR 200.300), the College will utilize one of five methods for procurement of items purchased with restricted/grant or non-restricted funds. The method of procurement utilized is based on the type of acquisition. The five methods of procurement are described below:

Micro-Purchases: Procurement by micro purchases are defined as purchases valued less than \$3000 (\$2000 for acquisition for construction items). These purchases do not require a bid process.

It is the policy of the College that all purchases, including micro purchases, restricted or unrestricted be requisitioned and approved through the College's electronic requisition system (Banner). This is the first step that must be completed to acquire a College purchase order for goods/services. Invoices may not be used to generate a requisition after goods and services of micro purchases are received. This would be in direct violation of the College's procurement policy and would be considered an unauthorized purchase.

A quote should be requested from the vendor and this quote should be used to enter a requisition in Banner. Procurement Services may require the user to obtain additional quotes for review and approval

before purchases are executed. Procurement Services may also request a copy of the quote for reference.

Micro purchases require approval hierarchy in Banner as do all requests for goods and services for the College.

Spelman College operates in a centralized procurement environment and Procurement Services provides the College with an on line Preferred Vendor list which supports the majority of micro purchases and streamlines the need to obtain quotes from various outside vendors. The Preferred Vendor list is not a sole sourced list but one that offers several vendor choices for a specific commodity. It is the policy of the College to support equality and fairness with vendors regardless of classification (minority owned, corporation, women owned, etc.) or purchase value for goods/services.

Procurement by Small Purchases: The procedure for acquiring an item valued at \$3,000 but less than \$25,000, is similar to the method for making micro purchases (see above), however, requests for purchases in this category must include price or rate quotes obtained from an adequate number of sources (as determined by Procurement Services/3 quotes). The Office of Procurement Services can assist in obtaining such quotes and/or sources if necessary.

If an item is valued at \$3000, but less than \$25,000 and 3 quotes are unavailable (i.e. sole vendor was pre-approved in a grant proposal by the awarding agency, etc.) the purchase may qualify under the non-competitive proposal/sole source provider methodology. (See Page 6 “Procurement by Non-Competitive Proposals”).

Procurement by Sealed Bids, Competitive Proposals / Non-Competitive Proposals: Procurement of items valued greater than \$25,000 will be accomplished utilizing sealed bids, competitive proposals or non-competitive proposals (sole source provider).

Procurement by Sealed Bid: If the procured service(s) or good(s) lends itself to a firm fixed price contract valued greater than \$25,000, and the award will be made in writing to the lowest responsive and responsible bidder, the sealed bid methodology is most appropriate. Bids are publicly solicited from at least three known suppliers and invitation for bids publicly advertised. Bids solicitations will provide bidders time to prepare bids prior to the date set for opening the bids. In such case, all bids will be publicly opened at the

time and place prescribed in the invitation for bids. Please contact Procurement Services for assistance in drafting all bid solicitations and other documentation when utilizing this method of procurement.

Procurement by Competitive Proposals: If the procured service(s) or good(s) lends itself to a firm fixed price contract valued greater than \$25,000, and the award will be made to the responsible firm whose proposal is most advantageous to the recipient's program with price and other factors considered the competitive proposal methodology is most appropriate. When procurement of services/goods requires the use of competitive proposals (3 bids are required); Procurement Services is available to assist if necessary the requesting Department or Principal Investigator in the development of a Request For Proposals (RFP), which will include, but is not limited to, the following: a scope of work, sub-contractor/vendor requirements and terms and conditions. If the vendor/subcontractor selected will be compensated utilizing federal funding, solicitations must include any federal terms and conditions to which the College is bound. This may include, but is not limited to: the selection of vendors/subcontractors with environmentally sustainable policies, and the inclusion of positive efforts towards the use of small, disadvantaged and minority owned firms.

Procurement by Non-Competitive Proposals: Procurement by non-competitive proposals (sole source provider) may be used only when the award of a contract is infeasible under small purchase procedures, sealed bids, or competitive proposals and at least one of the following circumstances applies:

- When the supplies or services are available from only one responsible source, and no other type of supplies or services will satisfy the recipient's requirements;
- When the recipient's need for the supplies or services is of such unusual and compelling urgency that the recipient would be seriously injured unless the recipient is permitted to limit the number of sources from which it solicits bids or proposals, or when the public exigency or emergency for the requirement will not permit a delay resulting from a competitive solicitation;
- The College and funding agency (in the case of restricted funding) has authorized non-competitive proposals/negotiations prior to awarding.

After solicitation of a number of sources and competition is determined inadequate, a Sole Source Justification Document must be submitted with the Banner requisition. This document may be acquired on the lotus notes dash board.

Contract Purchases: The College agrees to contract purchases where a dollar amount has been agreed upon to complete a job, usually within a designated weekly/monthly amount. The entire agreed upon dollar amount should be entered in Banner as a requisition. Procurement will enter the purchase in Banner as an open purchase order. This encumbers the funds and each time an invoice is received for the service rendered, it should be approved and sent to Accounts Payable for payment. Banner allows the purchaser to see each time payments are made, and Banner will subtract the payment from the initial amount of the purchase order.

In align with the College's policy, the Title III Office will not honor unauthorized purchases made with Title III funds.

Unauthorized Purchases: Spelman College operates on an electronic requisitions/purchase order system. Accordingly, all purchases for goods and services must be transacted through the purchase order process. The Check Request method of payment is limited to the College's weekly and/or monthly obligations such as utilities, dues, subscriptions, salary and travel advances, and other reimbursement expenses. Expenditures submitted on a Check Request form that should have been submitted as a purchase order will be returned to the requester and could result in nonpayment. No individual is authorized to enter into purchase contracts or in any way obligate the College for procurement indebtedness without approved purchase orders. Such negotiations are considered unauthorized purchases, and the individual entering into these non-authorized activities will be personally responsible for paying the vendor for services, supplies, or equipment received. Purchase orders are generated from the procurement department only. Submitting a requisition for an unauthorized service or product already received could result in disapproval or nonpayment.

Title III Supplemental Procurement Procedures

The following supplemental procedures should be followed prior to entry of requisitions for approval by the Title III Office:

1. The selected vendor for purchase of items with a per unit cost of \$3,000 or more must be pre-approved by Procurement.
2. New vendors must be pre-approved by Procurement.

3. Product quotes accompanying a requisition cannot be over 30 days old or have expired.

Uniform Guidance 2, CFR 200.205

"Debarment and Suspension (E.O. 12549 and E.O. 12689) —No contract may be made to parties listed on the General Services Administration's List of Parties Excluded from Federal Procurement or Non-procurement Programs in accordance with E.O. 12549 and E.O. 12689—Debarment and Suspension. This list contains the names of parties debarred, suspended, or otherwise excluded by agencies, and contractors declared ineligible under statutory or regulatory authority other than E.O. 12549.

Contractors with awards that exceed the small purchase threshold must provide the required certification regarding its exclusion status and that of its principal employees."

MONITORING BY THE TITLE III OFFICE

The Title III Office will keep a record of activity expenditures, and will review each requisition to determine the account balance before the requisition is processed. **Activities should maintain their own record of expenditures, using the initiating copy of the requisition as documentation. With the exception of personnel and fringe benefits, all grant funds should be encumbered by May 30 of each year. Funds not encumbered will be swept June 1 of each year to support other projects.**

RECORD-KEEPING AND RETENTION

The USDOE requires the College to keep records that show the amount of funds under the grant, how the grant funds were used, the total cost of the project, share of cost provided from other sources, and other records to facilitate an effective audit. The College must keep records that show compliance with program requirements and records that show significant project experiences and results. These records must be retained for three years after the final financial report is submitted for the activity for which the funds were granted. Should any litigation, claim, or audit start before the expiration of the 3-year period, the records shall be retained until all litigation, claims, or audit findings involving the records have been resolved and final action taken.

The Secretary and the Comptroller General of the United States or any of their authorized representatives have the right of access to any books, documents, papers, or other records of the grantee which are pertinent to the grant, in order to make audit, examination, excerpts, and transcripts. The right of access is not limited to the required retention period but lasts as long as the records are retained.

Records to Retain for Audit Purposes and External Evaluation (Financial and Program)

1. Budget reporting forms
2. Budget Revision Worksheets (including Departmental Transfers)
3. Bi-annual reports of progress
4. Telephone conversation records
5. Equipment inventory forms
6. Contracts
7. Registration forms and other documents from faculty development and training activities
8. Time & Effort Reports
9. Personnel Action Forms and other employment information (including vita, application forms, and affirmative action forms)
10. Consultant's reports
11. Purchasing requisitions
12. Travel reports
13. Released time reports
14. Evaluation reports
15. Workshop evaluations
16. Documents showing progress toward achieving objectives
17. Annual Performance Reports
18. All documents approved by the Program Officer, USDOE
19. Phase I & II Reports
20. Comprehensive Development Plan (CDP)
21. College Strategic Plans (a minimum of five-years)
22. Faculty and Staff Development documentation and support
23. Any other documents necessary for audit or review

MID-ANNUAL REVIEW OF PERFORMANCE YEAR

In an effort to prevent excessive carry-over funds into the next fiscal year, recipients of the Title III grants must submit mid-annual reviews of the performance of their HBCU and SAFRA grant program expenditures due to the USDOE in August. The April 15th progress reports submitted by the Activity Directors will be used by the Title III Office in the completion of the mid-annual performance year report. Activity Directors should report the progress of their respective activity in qualitative and quantitative terms.

ANNUAL PERFORMANCE REPORT

To receive a continuation award, recipients of the Title III grants must submit an annual performance report that demonstrates that substantial progress has been made toward meeting the objectives of the project.

Activity Directors will report the progress of their respective activity in qualitative and quantitative terms in the October 15 progress report for each grant period.

The annual report consists of the following sections:

1. Executive Summary
2. Institutional Profile
3. Activities, Focus and Outcomes
4. Project Status and Budget
5. Technology

REPORTING PROGRESS IN ACHIEVING TITLE III OBJECTIVES

Internal Evaluation

Internal evaluations are required by the USDOE. Spelman College will also conduct external evaluations for its Title III grant. The *Education Department General Administrative Regulations* state that “recipients shall monitor the performance of grant and subgrant supported activities. They shall review each program, function, or activity to assure that adequate progress is being made towards achieving the goals of the grant or sub-grant.” Internal evaluation will be carried out through bi-annual monitoring reports, annual performance reports, Title III meetings, quarterly budget reviews and site visits. External evaluations may be completed annually. External evaluators 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 being served by the projects.

Bi-annual Reports of Progress

In order to provide systematic documentation of the achievement of objectives for each of the grant activities, each activity director is required to complete at least a bi-annual report of progress in achieving grant objectives. The reports are to be placed on the forms provided by the Title III Office. They are due according to the following schedule included in this manual:

<u>Bi-annual Option</u>	
<u>Due Date</u>	<u>Period</u>
April 15 th	(Oct. 1 – Mar. 31)
October 15 th	(Apr. 1 – Sept. 30)

Annual Performance Report

In response to the Government and Performance Report Act (GPRA) of 1993, the annual performance report was modified to a web-based collection instrument. Its intent is to more accurately relay to Congress the effectiveness of the Title III Program in relation to the governing legislation that establishes its purpose. The Annual Performance Report for each program is normally due December of each year or by the deadline established by the U.S. Department of Education.

Quarterly Budget Site Reviews

In an effort to actively keep activity directors abreast of their spending level throughout the grant year, the Title III Office will conduct quarterly visits to review activity budgets. The reviews will be conducted on site and will focus on:

1. Budget tracking system
2. Expenditure recording
3. Spending level
4. Status of unexpended funds

Note: The Title III Office will reconcile with the Office of Budgets & Contracts quarterly.

Annual Site Visits

In an effort to keep activity directors on target with proposed objectives and timelines, the Title III Office will conduct semester visits to discuss activity progress. These visits will be conducted on site as well and will focus on evidences of completion, appropriateness of proposed timelines, and adequateness of documentation.

External Evaluation

The HBCU Program and the individual grant activities are recommended to be evaluated annually by an independent external evaluator. The evaluator conducts a summative evaluation (end of grant year) at the culmination of the grant year. Evaluators look at all aspects of grant activities, including a comparison of

actual accomplishments to the goals established for the period, documentation, and project expenditures, as well as effect of the project on strengthening the College. At the end of the grant period (5 years) the College may secure an evaluator to conduct a 5-year summary of the Comprehensive Development Plan.

OBLIGATION OF FUNDS DURING THE GRANT PERIOD

The College may use grant funds only for obligations it makes during the grant period. All requisitions should be entered in ample time for the obligation to be made within the grant period. The table below shows when obligations are made for various kinds of property and services.

When Obligations for Goods and Services are Made

If the obligation is for	the obligation is made
(a) Acquisition of real or personal property	On the date the College makes a binding written commitment to acquire the property
(b) Personal services by an employee of the College	When the services are performed
(c) Personal services by a contractor who is not an employee of the College	On the date which the College makes a binding written commitment to obtain the services
(d) Performance of work other than personal services	On the date which the College makes a binding written commitment to obtain the services
(e) Travel	When the travel is taken
(f) Rental of real or personal property	When property is used by the College

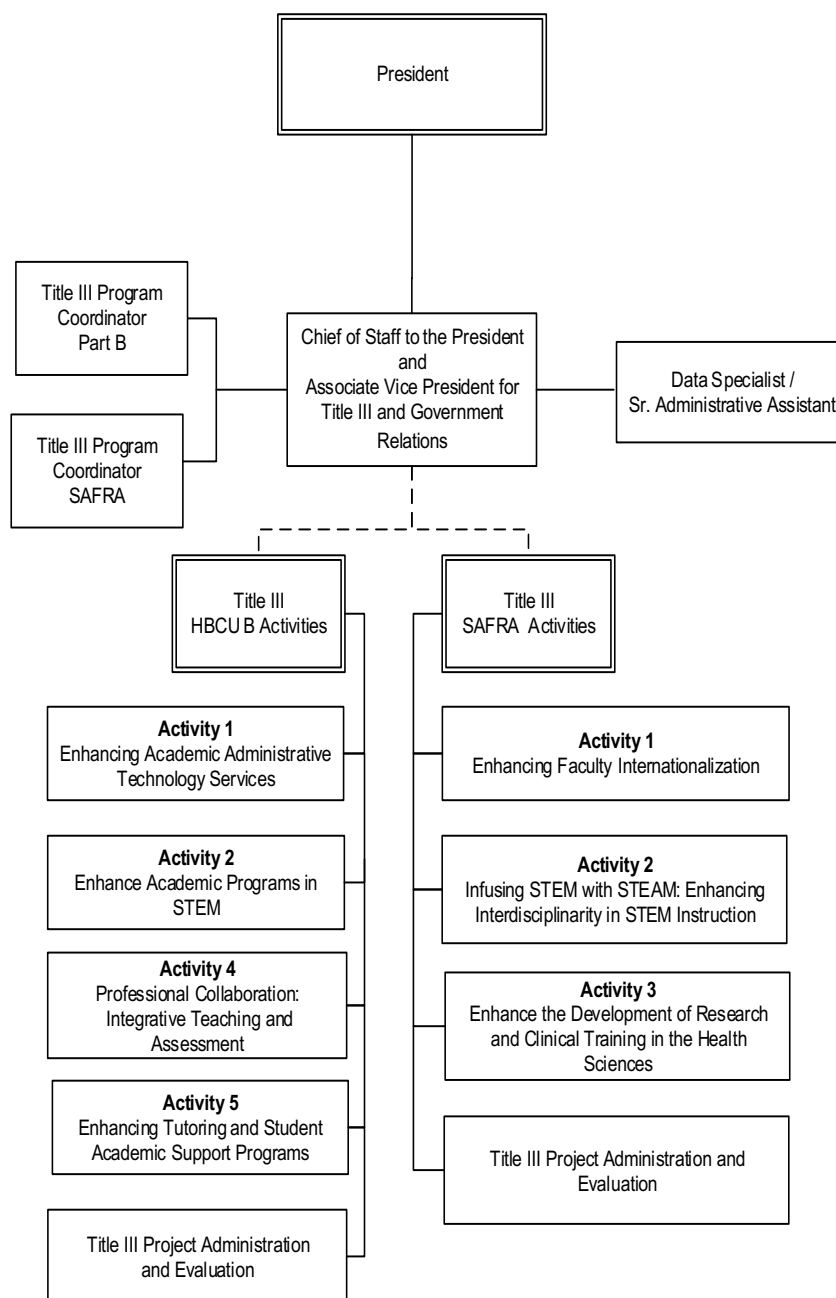
TITLE III WEBSITE

The Title III Website will be updated in the near future.

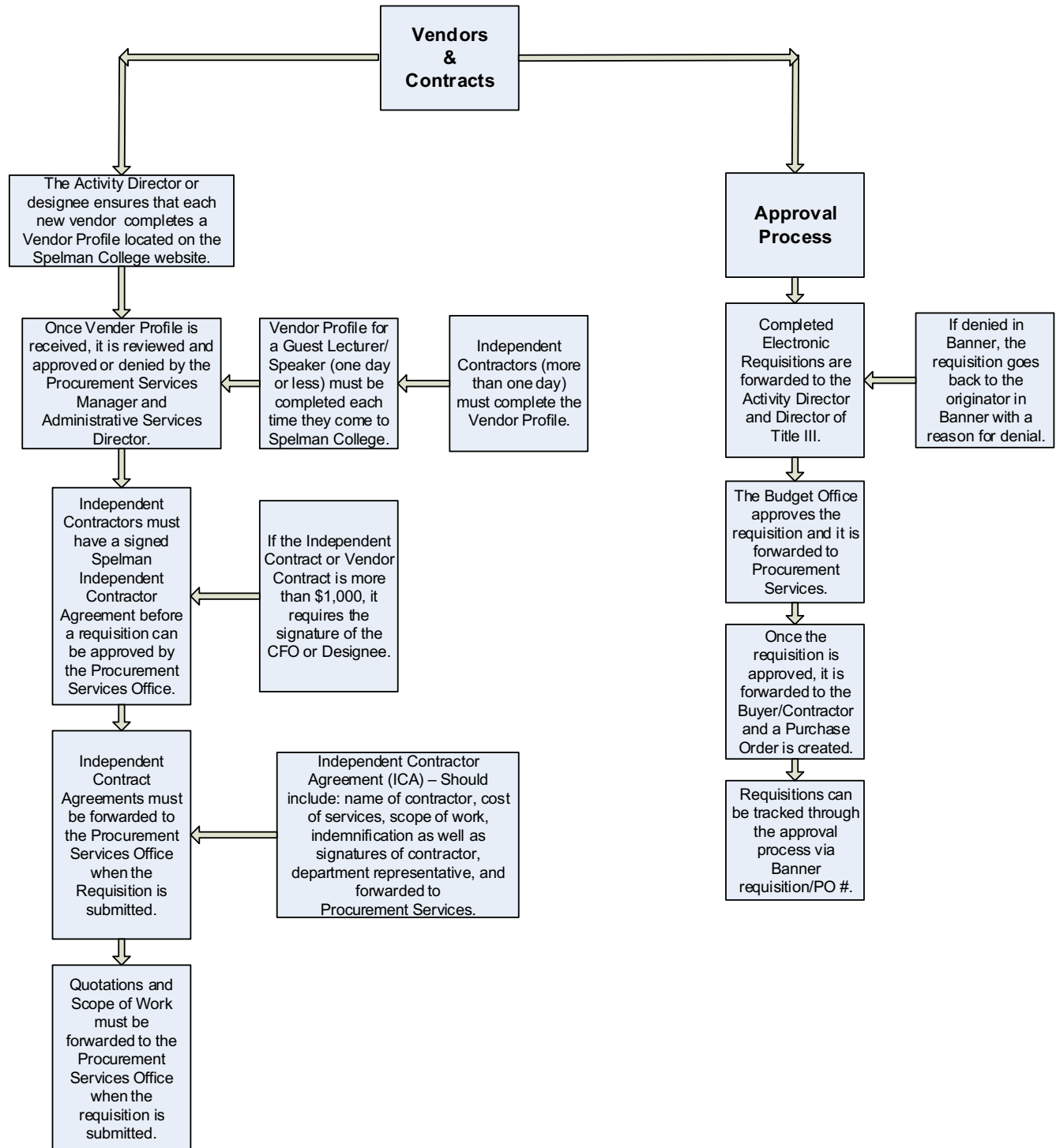
APPENDIX

November 4, 2015

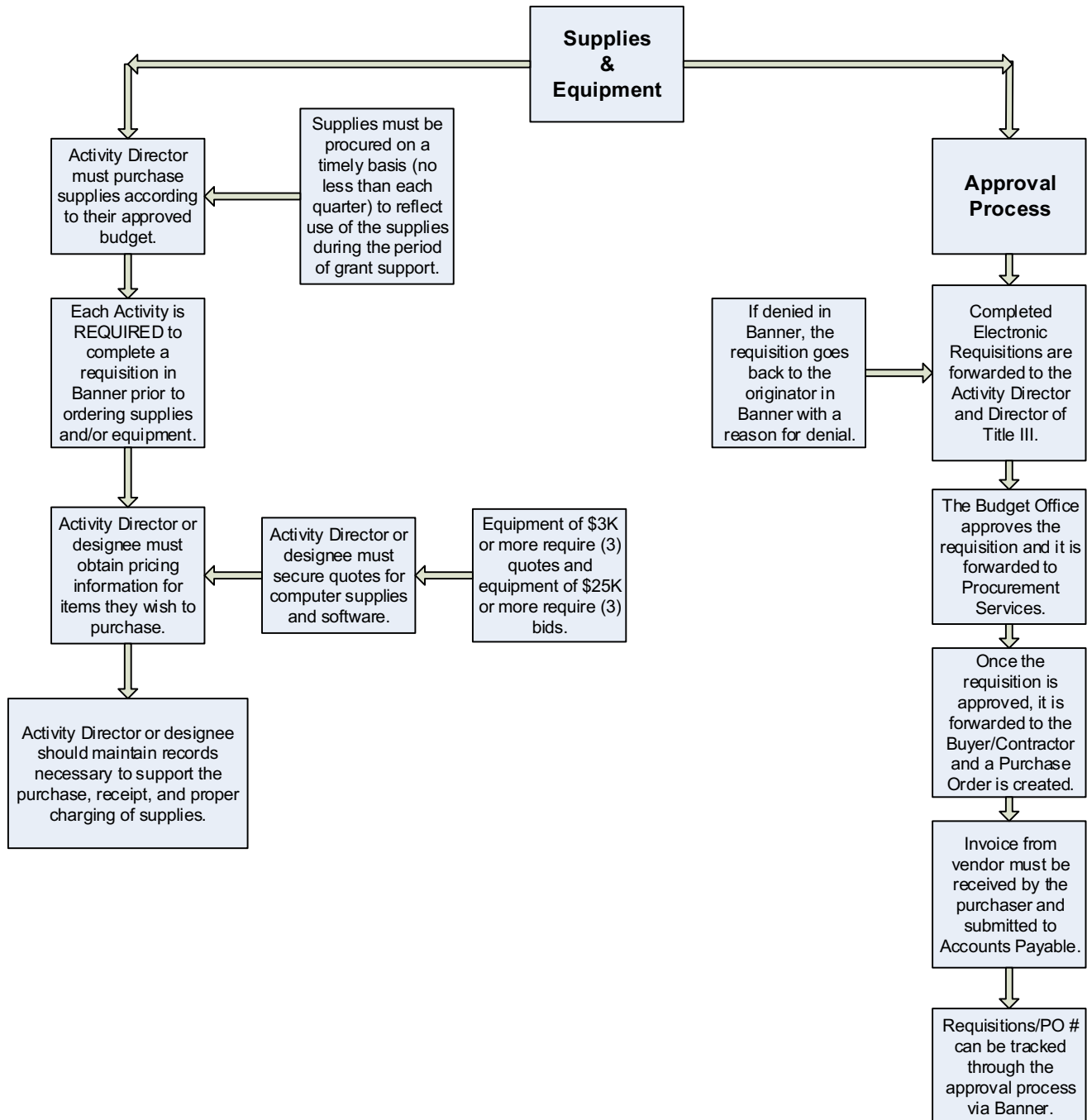
Spelman College Title III ORG Chart



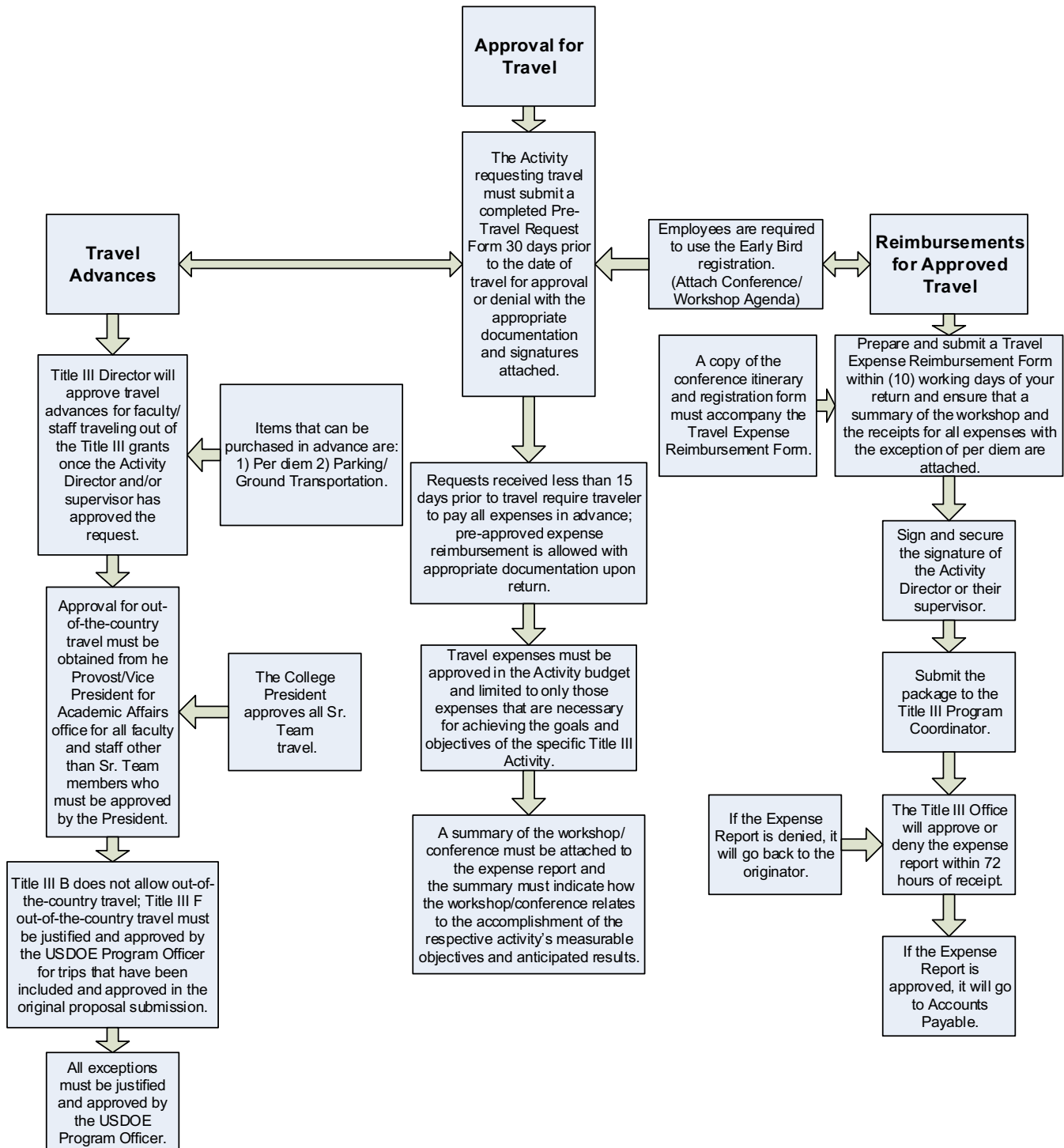
Approval and Denial Process for Title III Requisitions



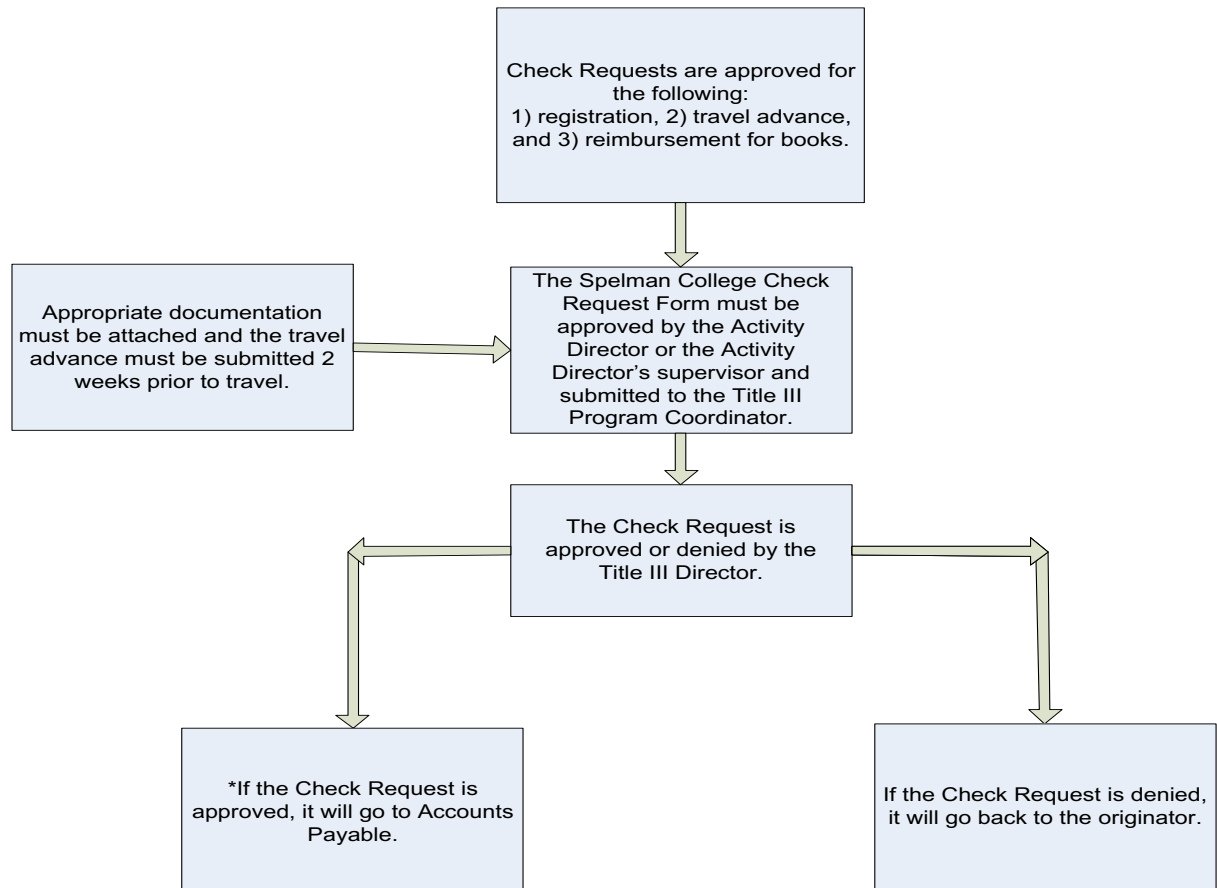
Title III Approval or Denial Requisition Process for Supplies and Equipment



Title III Pre-Approved Travel Process



Title III Check Request Process



*A travel advance is an "Advance" on the expenses and the expense report must be submitted to the Title III Program Coordinator, who will submit the expense report to Accounts Payable with the appropriate documentation.

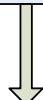
Note: If you have not received your check/reimbursement within 10 working days of your request, feel free to contact Accounts Payable.

Title III Process for Monitoring Time & Effort Reports

Each Activity Director is required to ensure that Time and Effort reports for all positions paid from their activity are submitted according to guidelines stated in the Title III Program Policies and Procedures manual.



Time and Effort reports are due by the 10th working day of each month after the work has been performed.



Time and Effort reports are to be signed electronically via Lotus Notes by the 1) Employee, and 2) Supervisor.



A copy is electronically submitted to payroll and a copy is housed in the respective Activity binder located in the Title III Office.

INSTRUCTIONS FOR COMPLETING TIME AND EFFORT MONTHLY REPORT FOR FACULTY AND STAFF FUNDED BY TITLE III

Section 1: STATUS

Please follow the prompts in the upper portion of the form and complete the entire section for STATUS.

Section 2: GRANT INFORMATION

- 1) Column One: Enter the name of the Activity and the Title III Objective(s) you addressed during this reporting period.
- 2) Column Two: Enter the Budget Code or Project/Grant Number.
- 3) Column Three: Enter the percentage of time assigned to Project/Grant.
- 4) Other Institutional Funding must be completed if your position is funded less than 100% by the Grant/Project. Please request this information from your supervisor.

Section 3: DUTIES

- 1) Column Two: List the date of the month next to the appropriate day.
- 2) Column Three: List the duties you performed each day toward meeting the objective(s).*
- 3) Column Four: List the number of hours you spent each day on the tasks you implemented to address the objectives.

**Note: If you are reporting effort for multiple federal grants, daily tasks and hours must be divided between the individual grants within Column Three with the total daily hours reported in Column Four.*

Section 4: DISTRIBUTION OF TIME

Staff

- Full-Time: 100% - 35 hours per week = 7 hours per day**
- Less than 100% - calculate based on your percentage of time associated with Title III using 7 hours as the base. (Eg: A person paid 80% out of Title III would calculate the following: $0.80 \times 7 \text{ hrs.} = 5.6 \text{ hours.}$)

Faculty

- For further instructions on how to calculate Distribution of Time, please contact Manager of Faculty Human Resources at Ext. 5024.

***Note: If you are 100% Title III, all of your duties should be related to at least one Activity objective.*

Title III Contact Information:

Title III Program Coordinator, HBCU B: Cynthia Roberts
croberts@spelman.edu or Ext. 5044

Title III Program Coordinator, SAFRA F: Carol Hanifa Hakim
chakim@spelman.edu or Ext. 5043

In the absence of a Title III Program Coordinator, please contact the Data Specialist/Sr. Administrative Assistant at Ext. 6426