

## GRANTS POLICY

### I. Policy Section

11.0 Business Functions

### II. Policy Subsection

11.2 Grants Policy

### III. Policy Statement

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

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

#### A. Authorization to Submit Grant Proposals

The President of GRCC, Chair of the Board of Trustees, Vice President for Finance and Administration and the Director of the Grants and Resource Development Department shall have the authority to sign and submit grant applications, proposals and bids for grant contracts on behalf of the College.

#### B. Authorization to Accept Grant Awards

The President of GRCC or Vice President for Finance and Administration shall have the authority to sign and accept grant agreements or contracts on behalf of the College.

#### C. Requirements for Grant Submissions:

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

2. No faculty or staff member of GRCC shall use the name of the College or act as a representative of the College in securing grant support without first obtaining preapproval from their supervising Dean or executive

administrator and the approval of the Director of the Grants and Resource Development Department.

3. If preapproved, the Director of the Grants and Resource Development Department shall review and approve all grant applications, proposals and bids for grant contracts to be submitted to funders by GRCC or in which GRCC participates as a partner, for compliance with the Grants Policy and applicable College, government and funder rules, laws, regulations and policies.

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

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

#### D. Responsibility for Implementation of the Grants Policy

1. Deans, Department Heads and the faculty and staff that they assign shall be responsible for administering grant awards received by their departments in compliance with this policy and the terms and conditions of each grant proposal and grant award. Grant Project Directors are responsible for submitting all reports required by funders. The Grants and Resource Development Department may assist in the submission of reports to funders.

2. The Accounting and Budget Services Department, the Grant Accounting Specialist, or a delegate, shall be responsible for the financial administration of grant awards in compliance with this policy and the terms and conditions of each grant proposal and grant award.

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

b) The Accounting and Budget Services Department and the Grant Accounting Specialist shall conduct internal audits and external audits by an independent auditor as required by funding entities and applicable Office of Management and Budget Circulars and Title 2 of the Code of Federal Regulations.

c) The Grant Accounting Specialist shall assist the grant project manager in monitoring that subrecipients are in compliance with the

requirements of appropriate standards for good business practices, including internal controls in accordance with OMB Circular A-133 Audits of States, Local Governments, and Non-Profit Organizations. The Grant Accounting Specialist shall receive assurance from the subrecipient that it complies with A-133 and that the subrecipient will notify GRCC of completion of required audits and of any adverse findings which impact the subaward. GRCC shall receive a copy of the subrecipients A-133 audit report before entering into or renewing the subaward.

d) The Grant Accounting Specialist shall be responsible for all financial reports required by funding sources.

IV. Reason for the Policy

The purpose of the Grants Policy is to establish requirements for the administration of grants at GRCC and to ensure compliance with applicable College, government and funder rules, laws, regulations and policies.

V. Entities Affected by this Policy

All GRCC faculty and staff involved in any aspect of grant proposal development, submissions, implementation and management.

VI. Who Should Read this Policy

All GRCC faculty and staff that are involved in any aspect of grant proposal development, submissions, implementation and management.

VII. Related Documents

A. College Documents

1. All GRCC Policies
2. [Grant Management Manual](#)
3. [Grant Concept Form](#)
4. [Dean/Exec Administrator Pre-Approval Form](#)
5. [Grant Submission Approval Form](#)
6. [Grant Partnership Pre-Approval Form](#)
7. [General Definitions](#)
8. [Time and Effort Certification Form](#)

B. Other Documents (laws, regulations, guidelines)

1. Education Department General Administrative Regulations (EDGAR)
2. OMB Circulars for Educational Institutions and Non-Profit Organizations (note now relocated to 2 CFR)

- OMB Circular A-21 for cost principles, Relocated to 2 CFR, Part 220
  - OMB Circular A-110 for administrative requirements, Relocated to 2 CFR, Part 215
  - OMB Circular A-133 for audit requirements
  - OMB Circular A-122 Cost Principles for Non-Profit Organizations, Relocated to 2 CFR, Part 230
3. Title 2 of the Code of Federal Regulations (CFR)
  4. National Science Foundation Proposal Award Policies and Procedures Guide
  5. Federal Register Notice (08/25/2011) - Issuance of the Final Rule on Financial Conflict of Interest Regulations
  6. Other applicable federal, state and local regulations

### VIII. Contacts

Policy Owner: Director, Grants and Resource Development Department

### IX. Definitions

- A. **Application:** A request for financial support of a project/activity, submitted to a funding entity and in accordance with instructions provided by the funder. (See also “Proposal”).
- B. **Award:** The provision of funds or direct assistance to provide general financial assistance to an organization or an individual to carry out an activity or program. (See also “Grant”).
- C. **Contract (under a grant)** – A written agreement between an award recipient and a third party to acquire commercial goods or services.
- D. **Funder:** The governmental unit, foundation, or other entity that awards grants.
- E. **Grant:** A financial assistance mechanism whereby money and/or direct assistance is provided to an eligible entity to carry out an approved project or activity and made on the basis of a submitted proposal, usually in response to application guidelines. (See also “Award”).
- F. **Grant Agreement:** A legal instrument for the transfer of funds from the funder to the grantee and which sets forth the terms and conditions of the award.
- G. **Grantee:** The organization or other entity that receives a grant and assumes legal and financial responsibility and accountability both for the awarded funds and for the performance of the grant-supported activity.

- H. **Grant Award Notification:** An official document signed by an authorized official stating the amount and the terms and conditions of an award for a discretionary grant.
- I. **Proposal:** A request for financial support of a project/activity, submitted to an external funder and in accordance with instructions provided by the funder. (See also “Application”).
- J. **Sub-Contract:** Arrangement whereby part of a sponsored project is carried out by a different organization/legal entity.
- K. **Sub-Grant:** A contract between institutions or partner for project participation in the prime grant. The lead institution that received the award initiates the sub-grant which is reviewed and signed by legal representatives of both institutions.
- L. **Sub-Recipient:** The legal entity to which a sub-grant is awarded and which is accountable to the recipient for the use of the funds provided.

## X. Procedures

### A. Grant Development Process

The Grants and Resource Development Department (Grants Department) shall be responsible for developing, implementing, and maintaining procedures to support the requirements of the Grants Policy. The Grants Department will assist faculty and staff to interpret and apply this policy and the policies and regulations of funding sources. All GRCC faculty and staff are expected to adhere to procedural steps in the process to develop a grant request as follows:

1. **Research, Planning and Proposal Development:** The Grants Department works with faculty and staff to locate grant opportunities and develop proposals that are well-written and complete through coordination, writing and editing support. Sufficient lead time for proposal review is required prior to submission of a grant proposal.
2. **Communication with Funding Sources:** To maintain strong relationships with funders and ensure consistent communications through a single point of contact, Grants Department staff serve as a primary contact with all funding sources.
3. **Pre-Approval Process:** No faculty or staff member of GRCC shall engage in grant development activities or act as a representative of the College to secure grant support without first obtaining approval from their supervising Dean or executive administrator and the approval of the Director of the Grants Department. The Dean or Executive Administrator

Pre-Approval Form provides written approval to the Grants Department to proceed with grant development activities.

4. **Grant Partnership Pre-Approval Process:** No faculty or staff member of GRCC shall engage with partners in grant development activities or act as a representative of the College to obtain grant support as a partner with another entity without first obtaining approval from their supervising Dean or executive administrator and the approval of the Director of the Grants Department. A signed Grant Partnership Approval Form is required to be submitted to the Grants Department prior to the submission of a grant proposal in which GRCC will be a partner. This pre-approval is required when GRCC is participating as a grant subrecipient or contractor or when GRCC is requested to submit a letter of support, letter of commitment or to sign a Memorandum of Agreement related to the grant project.
5. **Final Approval and Submission:** A Grant Submission Approval Form must be submitted to the Director of the Grants Department at least two weeks prior to submission of all grant applications. This form requires signatures from the Director of the Grants Department, the Executive Vice President of Business and Financial Services, and the President. The Grants Department submits all applications to funding entities to ensure that forms are accurately completed, all required documentation is included and that submission deadlines are met.

## B. Post-Award Procedures

Post award procedures are listed in the GRCC Guide to Grants Management. Project Directors or leaders on grant projects must:

1. Provide a copy of any grant award letter, signed contract, and grant budget to the Director of the Grants Department and the Grant Accounting Specialist upon receipt from the funding source. A meeting must be held with Grants Department staff to review grant policies and procedures.
2. Obtain authorized signatures on contracts in a timely manner. Carefully review the grant proposal and award letter and/or contract to verify the award amount, the budget breakdown, timelines and reporting requirements.
3. Be responsible for adhering to grant report deadlines. All reports must be submitted to the Grants Department for review a minimum of five (5) working days prior to the deadline.
4. Adhere to funding agency policies on publicity and promotion of the project.
5. File annual Institutional Review Board (IRB) documentation with the Institutional Research and Planning Department if required.

## C. Grants Administration

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

1. Management of grant projects is conducted by the project director assigned to the project during the grants development process.
2. Financial management of grants is administered by Business and Financial Services staff.
3. Human Resources is responsible for the process to hire new employees supported by grant funds.
4. The Institutional Research and Planning Department assists in gathering and analyzing data needed for evaluation of the project, when necessary.

#### XI. Forms

See VII. A. Related Documents

#### XII. Effective Date

June 3, 1991

#### XIII. Policy History

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

#### XIV. Next Review/Revision Date

April, 2018