



Spelman College

# **TITLE III PROGRAM POLICIES & PROCEDURES MANUAL**

Updated August 2025

## TABLE OF CONTENTS

### SECTION 1: SPELMAN COLLEGE TITLE III PROGRAMS

Uniform Guidance .....	5
Purpose of the Title III Program, Part B .....	6
Purpose of the Title III Program, Part F .....	7
Comprehensive Development Plan (CDP) .....	9
Phase II Proposals .....	9
Relation of Title III Activities to the Mission of the College .....	9
How Title III Funds are Allocated .....	10
The Grant Allocation Formula .....	10
Eligibility for Continuation of Funds .....	11
Title III, HBCU Part B Activities .....	11
Title III, HBCU Part F (Future Act) Activities .....	11

### SECTION 2: SPELMAN COLLEGE TITLE III PROGRAM RESPONSIBILITIES

Essential Functions of Spelman College's Title III Program Administration .....	12
Coordination Function .....	12
Program Liaison Function .....	12
Activity Liaison Function .....	12
Evaluation Function .....	13
Fiscal Function .....	13
Technical Assistance Function .....	13
Organizational Objective .....	13
Title III Office Staff .....	13
Management and Compliance .....	14
Bi-Annual Reports of Progress .....	14
Mid-Year Progress Report .....	14
Year-End Progress Report .....	15
Bi-Annual Schedule .....	15
Annual Performance Report .....	15
Internal Evaluation .....	15
Budget Site Reviews .....	16
Annual Site Visits .....	16
External Evaluations .....	16
Monitoring by the Title III Office .....	16
Record-Keeping and Retention .....	16
Records to Retain for Audit Purposes, Program Reviews, and External Evaluation .....	17
Essential Functions of Spelman College's Title III Program Activity Directors .....	18
Activity Directors' Responsibilities .....	18
Effort Reporting .....	19
Obligation of Funds During the Grant Period .....	19
Reporting Progress in Achieving Title III Objectives .....	20
Monthly Budget Summary Reports .....	20

Bi-Annual Activity Progress Reports .....	20
External Evaluation.....	20
Technical Support .....	20
<b>SECTION 3: FISCAL MANAGEMENT (PERSONNEL)</b>	
Hiring Title III Personnel.....	21
Employee Separation .....	22
Employee Effort Reporting.....	22
Faculty Compensation for Work Performed.....	22
Salary Rates for Academic Year.....	22
Reports of Release Time for College Employees .....	23
<b>SECTION 4: TRAVEL</b>	
Approval for Travel .....	24
Travel by Public Carrier.....	24
Meals and Incidentals .....	24
Lodging.....	25
Registration Fees.....	25
Other Business Expenses .....	25
Mileage .....	25
Car Rental .....	25
Travel Expense Reports .....	26
Travel Advances .....	26
International Travel.....	26
<b>SECTION 5: EQUIPMENT</b>	
Acquisition of Equipment and Other Facilities .....	28
General Purpose Equipment .....	28
Limitations on Purchase of Equipment.....	28
USDE Equipment Management Requirements .....	29
USDE Program Officer Responsibilities .....	29
Title III/College Inventory Guidelines.....	29
Procedures for the Acquisition of New Equipment .....	30
Procedures for Disposal of Fixed Assets .....	30
Surplus Equipment.....	30
Lost or Stolen Equipment .....	30
Loans and Transfers.....	31
Identification of Equipment Purchased with Title III Funds .....	31
Title III/College Inventory Guidelines for Computer and Educational Technology .....	31
<b>SECTION 6: SUPPLIES</b>	
Acquisition of Supplies.....	33

**SECTION 7: CONTRACTUAL/OTHER**

Lecturer/Speaker/Facilitator .....34  
Vendor Independent Contractor.....34  
Payment of Fees.....34  
Standards for Documentation of Use .....34  
Use of College Personnel.....35  
Evaluation of Workshops Supported by Title III.....35

**SECTION 8: PROGRAMMATIC CHANGES AND BUDGET REVISIONS**

Requests to USDE/Title III Project Director to Redirect the Use of Funds .....36  
Budget Revisions .....37  
Entertainment Expenses.....37

**SECTION 9: PROCUREMENT POLICIES**

Spelman College Procurement Policies and Procedures.....38  
Micro-Purchases.....38  
Procurement by Small Purchases .....39  
Procurement by Sealed Bids, Competitive Proposals/Non-Competitive Proposals .....39  
Procurement by Sealed Bid.....39  
Procurement by Competitive Proposals .....39  
Procurement by Non-Competitive Proposals.....40  
Contract Purchases .....40  
Unauthorized Purchases .....40  
Uniform Guidance 2 CFR 200.205 .....41

**TITLE III ORG & ACTIVITY CHART**

Spelman College Title III Administration Organization Chart.....42  
Spelman College Title III Activity Chart.....43

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## **SECTION 1: SPELMAN COLLEGE TITLE III PROGRAMS**

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; The Higher Education Opportunity Act of 2008 (HEOA), Pub. L. 110-315 reauthorized the HEA of 1965.

### **Uniform Guidance**

The Title III Office operates under the **Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (Uniform Guidance)**, which are federal regulations effective for all federal awards made after December 26, 2014, as adopted by the College. The President's Executive Office, Office of Management and Budget (OMB) **streamlined** 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 focus Federal resources more effectively 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, complementing 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 the 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, Part 200 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 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 that 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:

- a) Purchase, rental, or lease of scientific or laboratory equipment for educational purposes, including instructional or research purposes;
- b) Construction, maintenance, renovation, and improvement in classroom, library, laboratory, and other instructional facilities, including purchase or rental of telecommunications technology equipment or services;
- c) Support of faculty exchanges, faculty development, and faculty fellowships to assist these faculty members in attaining advanced degrees in their fields of instruction;
- d) Academic instruction in disciplines in which Black Americans are underrepresented;
- e) Purchase of library books, periodicals, microfilm, and other educational materials, including telecommunications program materials;
- f) Tutoring, counseling, and student service programs designed to improve academic success;
- g) Funds and administrative management, and acquisition of equipment for use in strengthening funds management;
- h) Joint use of facilities, such as laboratories and libraries;
- i) Establishing or improving a development office to strengthen or improve contributions from alumni and the private sector;
- j) 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;
- k) Establishing community outreach programs that will encourage elementary and secondary students to develop the academic skills and the interest to pursue postsecondary education;
- l) Establishing or improving an endowment fund;
- m) Acquisition of real property in connection with the construction, renovation, or addition to or improvement of campus facilities;
- n) 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;
- o) 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;

- p) Other activities proposed in the application submitted pursuant to section 1063a of this title that—
- 1) contribute to carrying out the purposes of this part; and
  - 2) 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:

- a) Activities that are not included in the grantee's approved application;
- b) Activities described in paragraph 16 of this section that are not approved by the Secretary;
- c) Activities that are inconsistent with any State plan of higher education that is applicable to the institution;
- d) Activities that are inconsistent with a state plan for desegregation of higher education that is applicable to the institution;
- e) Activities or services that relate to sectarian instruction or religious worship; and
- f) 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, for the Historically Black Colleges and Universities was designated as the Student Aid and Fiscal Responsibility Act (SAFRA) was replaced with the Fostering Undergraduate Talent by Unlocking Resources for Education Act (Future Act).

On December 20, 2019, President Trump signed the Fostering Undergraduate Talent by Unlocking Resources for Education Act (FUTURE Act; P.L. 116-91). The law primarily addresses three higher education issues:

- It amended the Higher Education Act (HEA) to permanently authorize grant funding for programs to support Historically Black Colleges and Universities (HBCUs) and Minority-Serving Institutions (MSIs). The law authorizes \$255 million in annual mandatory funding. Authorization for this funding expired after FY 2019.
- It amended the HEA and the Internal Revenue Code (IRC) to specify a process through which individuals and applicable family members may provide authorization for the Internal Revenue Service (IRS) to disclose certain federal income tax return information to the Department of Education (ED) and other authorized persons for the administration of financial aid programs. The law further amends the HEA to operationalize this process

fully. Prior to this amendment, the IRS could not readily share return information directly with ED or associated parties.

- It increased mandatory appropriations for Pell Grants by \$25 million in FY2020 and each succeeding fiscal year. HEA Programs for HBCUs and MSIs Prior Status and FUTURE Act Provisions Title III-F of the HEA authorizes \$255 million in mandatory appropriations for programs for HBCUs and MSIs. The programs received this funding from FY2008 until the authority expired at the end of FY 2019. Section 2 of the FUTURE Act amended Title III-Part F of the HEA to permanently authorize mandatory appropriations for “fiscal year 2020 and each fiscal year thereafter.”

These Title III funds may be spent only on activities included in the approved Comprehensive Development Plan (CDP) submitted for the 2020-2025 grant cycle. 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. **In no case may Title III funds take the place of funds that would otherwise be available.**

According to 20 USC Chapter 28 Subchapter III, Part F §1067q (2)(c), the following activities are allowable and can be carried out under the Title III, Part F Program:

- (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 (Part F).**

### **Comprehensive Development Plan (CDP)**

The Comprehensive Development Plan described the activities to be carried out in the FUTURE Act grant. The CDP described how the grant funds would 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. The CDP includes a project abstract that is limited to one (1) page, single-spaced. The project abstract must consist of information about the institution's proposed five (5) year project and provide a summary of the proposed activities and how they will address the strategic themes and initiatives of Spelman College's strategic plan.

### **Phase II Proposals**

The Phase II Reports (Annual Budget Plans) detail the anticipated outcomes for the following grant period and are due before the subsequent grant year begins. The Phase II Reports describe the objectives and performance indicators that will be accomplished in the new grant year. Objectives and performance indicators must be stated in measurable terms so that intended outcomes are indicated and date, month, and or year be stated for attainment. Phase II Reports must also include the Implementation Strategy Form that documents the discrete tasks performed to accomplish the activity's intended outcomes, along with the persons responsible and a timeline for completing each task. The report also includes the budget summary and narrative to document the funding needed to accomplish programmatic goals and objectives as outlined in the Comprehensive Development Plan (CDP).

### **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 specific 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 challenges that inhibit the institution from realizing its mission as identified by the Five-Year Strategic Plan for Spelman College. The final decision on using Title III funds in support of the College rests with the President. Faculty who wants to propose projects for consideration must submit a concept paper to their Department Chair for review and approval. The Department Chair will forward approved proposals to the appropriate Division Chair for review and approval. The Division Chair will forward approved proposals to the provost for review and approval. The Vice Provost for Faculty will forward proposals approved by the Provost to the Title III Director. The Title III Director will forward all proposals approved by the Provost to the President for approval or denial.

Staff who want to propose projects for consideration must submit a concept paper to their Unit Head for review and approval. The Unit Head will forward approved proposals to the appropriate Administrator for review and approval. The Administrator will forward approved proposals to the

appropriate Vice President for review and approval. The Vice President will forward proposals to the Title III Director, who will forward all proposals to the President for approval or denial.

### **How Title III Funds Are Allocated**

Data submitted in response to the Phase I Formula Data is used to calculate awards for Title III funding. Funds are allocated by a formula that 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 at 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 fifty percent (50%) of appropriations divided by the 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 twenty-five percent (25%) of appropriations divided by the number of graduates of the College during the school year immediately preceding the year of application.
3. Percentage of graduates, who within five (5) 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 twenty-five percent (25%) of appropriations divided by 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, HBCU Part B Activities**

The following activities are included in the Comprehensive Development Plan for the Strengthening HBCUs Program Part B 2022-2027:

1. Spelman Technology Enhancement Project (Solutions, Services, and Institutional Processes)
2. Innovation Teaching, Learning, and Scholarship
3. Supporting Persistence and Completion through Enhanced Academic and Student Services
4. Advancing Education and Promoting Innovation in STEM for the Division of Natural Sciences and Mathematics
5. Enhancing Excellence of Minority Women in STEM
6. Enhancing Matriculation Pathways: Cross Collaborative Student Support Services
7. Developing Technology Infrastructure to Support the Intersectionality of the Arts and Sciences
8. Project Administration and Evaluation

### **Title III, HBCU Part F (FUTURE Act) Activities**

The following activities are included in the Comprehensive Development Plan for Strengthening HBCUs Program Part F (FUTURE Act) 2025-2030:

1. Elevating Global Citizenship at Spelman College
2. Advancing Applied and Interdisciplinary STEM Education Through Real-World Integration and Innovation
3. Spelman Technology Enhancement Project -- Artificial Intelligence
4. Project Administration and Evaluation

## **SECTION 2: SPELMAN COLLEGE TITLE III PROGRAM RESPONSIBILITIES**

The Title III Office serves as the administrative unit for College's Title III programs. The primary goals are to ensure that the institution remains in compliance with federal regulations, monitor funded activities to facilitate substantial progress toward the achievement of objectives, and inform

the President and the Spelman Title III community of the latest trends affecting the use of Title III funds received from the U.S. Department of Education (USDE).

The grants management and administrative oversight responsibilities are reflected in the objectives of the Program Administration Activity. Achievement of the objectives and performance indicators will help maintain the College's compliance with all federal guidelines. To ensure that Spelman remains in continual compliance and has effective and efficient Title III programs, the Title III Office works, in conjunction with external contractors, to ensure that the activity directors and Title III related staff, including grants and contracts, institutional research, planning, human resources, the budget office, to name a few, assist in maintaining 100% compliant with federal guidelines while ensuring that Spelman is continually strengthening its ability to be exemplary stewards of the Title III funds.

### **Essential Functions of Spelman College's Title III Program Administration**

**Coordination Function**—Monitors Title III policies and procedures set forth by the U.S. Department of Education (USDE) and relates them to the Activity Directors and other appropriate College personnel. Regular meetings are held with them to ascertain the extent to which they are meeting the objectives delineated in their plans of operation. Additionally, Activity Directors submit bi-annual reports that document programmatic outcomes.

**Program Liaison Function**—Serves as the College's liaison with the U.S. Department of Education. The Director executes all changes, approvals, and other appropriate contacts.

**Activity Liaison Function**- Each Activity has a dedicated Title III staff person assigned to their activity and works with the Activity Director and their support personnel to ensure timely spending of Title III funds and assist with any technical questions they may have, including referring College-related questions to the appropriate contacts.

**Evaluation Function**—Ensures that the Title III Programs are assessed, and progress documented through ongoing internal and external evaluations to assist Activity Directors in acquiring an evaluation rating of a minimum of 3.0 by the end of the grant period:

**1.0 = No significant progress**

**2.0 = Performance less than 50% of the measure identified**

**3.0 = Performance between 50% and 90% measure**

**4.0 = Performance within 10% + of the measure (91%-110%)**

**5.0 = Performance exceeds the measure by more than 10% (111% and above)**

**Fiscal Function**-Ensures ongoing compliance with college and federal regulations and guidelines relating to budget expenditures, records, and oversight.

**Technical Assistance Function**

Ensures that activity directors are provided technical assistance in writing measurable objectives and performance indicators, data collection and analysis, writing data-driven reports, completing Phase II Applications and Annual Performance Reports.

**Organizational Objective**

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

**Title III Office Staff**

The Title III Office consists of the following five (5) positions:

- Director of Title III
- Senior Administrative Assistant
- Title III Projects Budget Manager
- Title III Assessment and Data Specialist
- Title III Innovation and Efficiency Specialist

The primary responsibility of the Title III Office staff is to meet the needs of Activity directors and support staff by guiding the processes and procedures pertaining to Title III. Specifically, Title III staff are responsible for providing technical support to facilitate the effective management of Title III funds. The Director, Projects Budget Specialist, Assessment and Data Specialist, Senior Administrative Assistant and Title III Innovation and Efficiency Specialist will provide one-on-one guidance and technical support for activity directors and their staff, as needed. Annual support and training by the office are inclusive of:

- a) Streamlining processes for effective management and processing of Title III forms.
- b) Attending required meetings to stay abreast of the latest trends affecting Title III.
- c) Establishing effective ways to communicate Title III processes, requirements, and USDE updates to Administrators, Activity directors, and support staff.
- d) Guiding the Spelman College community to ensure ongoing compliance with Title III, institutional policies and procedures, and federal grant regulations.

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

### **Management and Compliance**

All Title III Activities will be evaluated no less than bi-annually by assessing the impact of spending to support program initiatives and comparing the stated, measurable objectives with the achieved outcomes. The following bi-annual reviews will be conducted, and reports generated:

- a) Budget review
- b) Progress of activity (measurable objectives and outcomes)
- c) Inventory review
- d) Internal evaluation
- e) External summative review

To prevent excessive carry-over funds into the next fiscal year, recipients of the Title III grants must submit mid-year reviews of the performance of their HBCU and FUTURE Act grant program expenditures due to the USDE in August.

### **Bi-Annual Reports of Progress**

The **Mid-Year Progress Report** is due on April 15th of each grant year. These reports will be used to monitor activity progress and complete the Interim Performance Report (IPR). Activity directors should report on the progress of their activity in qualitative and quantitative terms. Also, activity directors submit a **Year-End Progress Report** on October 15th of each grant year. This report describes the outcomes (reported in quantitative and qualitative terms) accomplished for the activity's objectives and performance indicators during the grant year. The Title III Office uses the year-end report to complete the annual external evaluation and the Annual Performance Report (APR) required by USDE.

### **Mid-Year Progress Report**

The April 15<sup>th</sup> Progress Reports submitted by the Activity directors to the Title III Office will be used to complete the mid-year annual review of the performance year for the HBCU and FUTURE Act grant programs. Expenditures will be monitored monthly to prevent excessive carry-over funds into the next fiscal year.

### **Year-End Progress Report**

The October 15<sup>th</sup> Progress Report submitted by the Activity directors to the Title III Office will be used to complete the Annual Performance Report (APR) due to the U. S. Department of Education

in January; therefore, the October 15<sup>th</sup> report should include the cumulative outcomes for all measurable objectives stated in qualitative and quantitative terms.

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:

### Bi-Annual Schedule

<u>DUE DATE</u>	<u>PERIOD COVERED</u>
April 15 <sup>th</sup>	October 1 – March 31
October 15 <sup>th</sup>	April 1 – September 30

**The October 15 report is cumulative, October 1 – September 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. It intends to relay more accurately 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 usually is due December of each year or by the deadline set by the U.S. Department of Education.

### Internal Evaluation

The USDE requires internal evaluations. 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 sub-grant 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.

### Budget Site Reviews

As needed, to actively keep activity directors abreast of their spending level throughout

the grant year, the Title III Office will conduct visits each semester 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**

The Title III Office will conduct semester visits to discuss activity progress to keep activity directors on target with proposed objectives and timelines. These visits will be conducted on-site and will focus on evidence of completion, appropriateness of proposed timelines, and adequateness of documentation.

### **External Evaluations**

The HBCU Program and the individual grant activities are encouraged to be evaluated by an independent external evaluator. The evaluator conducts a summative evaluation at the culmination of the grant year. Evaluators look at all aspects of grant activities, including comparing actual accomplishments to the goals established for the period, documentation, project expenditures, and the project's effect on strengthening the College. At the end of the five (5) year grant cycle, the College may secure an evaluator to conduct a five (5) year impact summary of the Comprehensive Development Plan.

### **Monitoring by the Title III Office**

The Title III Office will record activity expenditures and review each requisition to determine the account balance before the requisition is processed. Activities should maintain their record of expenditures, using the initiating copy of the requisition as documentation. Except for personnel and fringe benefits, all grant funds should be encumbered by May 31 of each year. Funds not encumbered will be swept on June 1 of each year to support other projects.

### **Record-Keeping And Retention**

The USDE requires the College to keep records that show the amount of funds under the grant, how the grant funds were used, the project's total cost, 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 (3) 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 three (3) year period, the records shall be retained until all litigation, claims, or audit findings involving the records have been resolved and final action is taken.

The Secretary and the Comptroller General of the United States or any of their authorized representatives have the right to access any books, documents, papers, or other grantee records that are pertinent to the grant to make an 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, Program Reviews, and External Evaluation**

1. Annual Approved Budget Plan (Phase II Proposal)
2. Budget Revision Worksheets (including Departmental Transfers)
3. Bi-annual reports of progress
4. Email communication records
5. Equipment inventory forms
6. Contracts and Contract Reports
7. Registration forms and other documents from faculty development and training activities
8. Effort Certification reports
9. Personnel Action Forms and other employment information (including vita, application forms, and affirmative action forms)
10. Annual Uniform Guidance Audit Report
11. Purchasing requisitions
12. Travel Expense Reports
13. Release 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 USDE Program Officer
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

### **Essential Functions of Spelman College's Title III Program 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 activity budget and objectives modifications. Only designated support staff should initiate requests for funds, and the requests must be based on 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.
- 2) Expending funds in a timely manner to ensure that all funds are used annually by May 31.
- 3) Understanding that all funds not encumbered by May 31 annually will be swept and used to support additional projects identified by the Administration.
- 4) Expending one hundred percent (100%) of the funds allocated to the activity annually to achieve the objectives stated in the Comprehensive Development Plan (CDP) and annual Phase II plan.
- 5) Submitting timely bi-annual progress reports to the Title III Office that reflect activity outcomes using qualitative and quantitative results and providing required information to assist the Title III Office with completing the Annual Performance Report (APR) at the end of each award year.
- 6) Maintaining up-to-date records and documentation of programmatic achievements of the activity.
- 7) Completing appropriate programmatic reports required by the U.S. Department of Education (USDE) and the College.
- 8) Attending scheduled meetings and training sessions for Activity directors and support staff.
- 9) Ensuring that the Title III Office is notified of all vacant positions and faculty sabbaticals.
- 10) 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 to accomplish the activity's objectives and performance indicators.
- 11) Preparing for and participating in required internal and external evaluations, inventory reviews, and audits.
- 12) Ensuring that the Effort Reporting form is completed, signed, and submitted to the Title III Office by the fifteenth (15<sup>th</sup>) working day biannually (April/October) and that employees who are paid from the grant who separate from the College complete and submit a final Effort Reporting form before their last day of employment.
- 13) Ensuring that all budget requests are submitted to the Title III Office within the timeframes indicated in this manual, all documents required to support the request(s) are attached for review.
- 14) Ensuring that all request(s) are approved or denied by the Project Director before requesting payment for travel and/or to purchase supplies, equipment, etc.

- 15) Ensuring that all encumbrances are cleared by the deadlines set by the Title III Office.
- 16) Submitting a one-page success story of the activity’s achievement annually by November 15.

**Effort Reporting**

The Uniform Guidance requires that time distribution records must be maintained for all employees whose salary is paid in whole or in part with federal funds. The electronic Effort Reporting form is located in eTrieve and is to be completed biannually by the faculty and staff persons compensated from Title III funds, signed by the employee and the employee’s supervisor; by the fifteenth (15<sup>th</sup>) of April and October. The electronic form is routed to the Payroll and Title III Offices.

Failure to comply with this federal requirement will result in the employee not being compensated. Faculty must submit two (2) effort reporting forms for each grant award period from September to May.

All Effort Reporting Forms must reflect the scope of work and percentage of time that correlates with the activity objectives. If reporting efforts for multiple federal grant programs, hours reported must be accurately distributed across each grant program.

**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 commitments are made for various kinds of property and services.

<b>If the obligation is for</b>	<b>The obligation is made</b>
(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

### **Reporting Progress in Achieving Title III Objectives**

**a) Monthly Budget Summary Reports**

Budget Summary reports will be electronically sent to the Activity directors monthly for review and reconciliation.

**b) Bi-Annual Activity Progress Reports**

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 15<sup>th</sup>** for the period October 1-March 31 and **October 15<sup>th</sup>** for the period April 1-September 30.

**c) External Evaluation Reports**

It is encouraged that external evaluations be conducted. In consultation with the President, the Title III Director will recommend external evaluators to conduct the evaluations.

### **SECTION 3: FISCAL MANAGEMENT (PERSONNEL)**

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

#### **Hiring Title III Personnel**

According to the Faculty and Staff Employee Handbook provisions, personnel must be hired in a non-discriminatory manner. The Title III Office requires the activity director to provide a résumé and job description for each person 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 the Office of Human Resources (HR), the activity director, and the project director. All College hiring procedures will be followed in hiring personnel for the Title III grant.

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

- a) Activity completes the appropriate personnel recruitment forms, as required by the Office of Human Resources (HR) and forwards the completed form to the appropriate offices for approval. (**Note:** Federal regulations require the Project Director or designee to sign/approve all documents.)
- b) The hiring manager will create a requisition for the Job Posting using the instructions below:
- c) The job openings may be posted on the Spelman web page through PeopleAdmin. Normally, the postings remain open until filled. Each job posting notice will include the date of posting, job title, job summary, essential duties, and qualifications (required skills and abilities).
- d) Office of Human Resources advertises the position via requested media.
- e) The hiring manager/activity director reviews all applications and refers to the supervisor only those that meet the qualifications for the position advertised.
- f) After selecting a potential employee, the hiring manager processes a Personnel Action form and forwards the form to the appropriate offices for approval. (**Note:** The new employee must not begin work before processing this form and receiving a letter of employment from HR.)
- g) 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 vitae or résumé will serve this purpose.**

### **Employee Separation**

When employees no longer work for the College or are replaced for any reason, the Title III Office must be notified immediately in writing with appropriate documentation. Copies of correspondence, resignation letters, and appropriate HR forms will serve this purpose.

### **Employee Effort Reporting**

The U.S. Department of Education (USDE) requires documentation of time spent working on Title III activities by all persons fully or partially paid with Title III funds. Employees (faculty and staff) should complete the biannual Effort Reporting form and submit it electronically to their supervisor for approval (signature required) with copies to the Payroll Office and to the Project Director by the fifteenth (15th) working day of April/October following the service rendered. Instructions for the completion of Effort Reporting appear in the Appendix of this manual and on eTrieve. The

completed form must show the scope of work that correlates with the activity objective(s) associated with one hundred percent (100%) of the work performed for the College during the reporting period, 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 paid for work performed in the grant. The regulations also prohibit payments for intra-college consulting. Faculty stipends will be paid once the workshop and/or assignment has been completed. Faculty research stipends may be handled differently. 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 these grants by a faculty member during the academic year must be based on the faculty member's regular compensation for the continuous period, which constitutes the basis of the salary under the practice of the institution concerned. Charges for work performed during all or any portion of such a period are allowable at the base salary rate. In no case will the charge, regardless 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 faculty earnings. This principle applies to all members of the faculty at the institution.

### **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."

## **SECTION 4: 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 traveling with grant funds must submit a **Pre-Travel Authorization Request form** to the Title III Office (in eTrieve) no less than thirty (30) days before the actual travel date. Note: Any requests received less than fifteen (15) days before the travel date if approved, will require the traveler to pay all travel expenses in advance and submit a check request for reimbursement upon return. On the Pre-Travel Authorization Request form, include the total cost of the trip (airfare, taxi fare, registration fees, meals, mileage, and lodging, inclusive of taxes and other fees). 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 the workshop/conference relates to accomplishing the respective activity's measurable objectives and anticipated results. Travel related to presenting at a conference is not allowed. Students are not permitted to use Title III HBCU B or F (FUTURE Act) funds for travel.

**Note:** Documents to support the travel request, such as conference agenda, hotel, airfare, etc., should accompany the request. Travel requests, once approved, must follow the Spelman Travel Policy.

### Travel by Public Carrier

Employees who travel by airline or other public carriers have two (2) options for securing tickets: Book through 1) Travel, Inc. (agency on contract with the College) or 2) personal credit card. All tickets secured through Travel, Inc. or Worldwide 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. The provost must approve all international travel for faculty. Tickets for international travel can also be reserved through Travel, Inc. or Worldwide Ventures. The Title III Projects Budget Specialist will confirm the purchase of the reserved ticket from Title III funds with the travel agency.

### 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 travel days and meals 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 Fee

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

- a) Pay in advance and seek reimbursement upon return with a paid receipt, or
- b) 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 Pre-Travel Request form 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

The requestor’s supervisor and the Title III Office must approve personal vehicle usage in advance. The rate of reimbursement is provided in the Spelman Travel Policy.

### Car Rental

Travel guidelines stipulate that costs for rental car reimbursement 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 expenses must be approved in advance by the supervisor and Project Director; the original receipt must be attached to the reimbursement voucher.

### Travel Expense Reports

A **Spelman College Travel Expense Report** must be submitted to the Title III Office within ten (10) business days upon return from the trip. 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, division chair, and/or the provost, and submit the Travel Expense report and supporting documentation to the Title III Office. The supporting documentation must include at least a **250-word** summary of the purpose for the travel and the impact on Activity related objectives and outcomes. (In some instances, the activity director may be responsible for assessing and reporting the impact of the travel taken by faculty and staff on activity-related objectives in the Activity’s Bi-Annual Progress Report.)

**Note: A copy of the conference itinerary, registration form, and summary (at least 500 words) of the workshop/conference must accompany the Travel Expense Report.**

### **Travel Advances**

According to the Spelman Travel Policy, the supervisor and Project Director will approve travel advances for faculty/staff who travel with Title III grant funds. Upon returning from the trip, the employee must complete a Spelman College Travel Expense Report **within ten (10) business days of the return date** to document how the travel advance funds were used. Employees should refer to sections two (2) and three (3) in the Spelman Travel Policy to answer any questions regarding documentation of expenses.

- a) If funds are due to the employee, reimbursement will be issued once the Travel Expense Report has been submitted and reviewed following the Spelman Travel Policy.
- b) If funds from a travel advance are due to the College, the employee should return funds to the College using either of the following methods:
  - Cash can be deposited at the Cashier's Office located in Packard Hall. A copy of the receipt from the cashier should be attached to the expense report before submitting it to the Office of the Controller.
  - The employee can write a personal check payable to the College. The check can be deposited at the Cashier's Office located in Packard Hall. A copy of the receipt from the cashier should be attached to the expense report before submitting it to the Office of the Controller.

**Note:** Advances must be repaid fifteen (15) days after returning from the trip.

### **International Travel**

Approval for international travel must be obtained from the Provost/Vice President for Academic Affairs Office for all faculty. The President approves international travel for the Senior Team. Title III restricts international travel to trips that have been included and approved in the original proposal submission. All exceptions must be justified and approved by the USDE Program Officer. During the end of a grant award's five (5) year period, all expense reports for international travel must be received by August 15.

**Note:** International authorization is required for any travel outside of the 48 states. (Alaska, Hawaii, and U.S. territories are considered as international travel destinations.)

## **SECTION 5: EQUIPMENT**

Equipment is nonexpendable, tangible personal property (including information technology systems), which has an acquisition cost of \$5,000 or more per unit and useful life of more than one (1) year (2 CFR 200.33).

Spelman Title III policy requires that:

- a) Items of this nature are acquired during the first quarter of the grant year (October 1 – December 31). (See College Purchasing Policy)
- b) A completed and approved FMS Equipment Approval Form must be submitted during the Comprehensive Development Plan (CDP) and/or Phase II planning process.

### **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 or provided for by the research agreement terms. Total expenditures for permanent equipment may not exceed ten percent (10%) of the amount allotted for the permanent equipment category by the sponsoring agency. They must be listed in the budget for purchase (through an approved budget or other documents) with approval.

Requests to purchase equipment using Title III funds require completing and submitting an FMS Equipment Approval Form and Title III Purchase Request Form. The forms must contain the appropriate approvals, and the manufacturer's specifications must be attached. The Title III Office will return forms missing the appropriate manufacturer's specifications to the requester.

**Note: Principal Investigators (PI) are informed to acquire insurance to purchase equipment while placing Purchase Requisitions.**

### **General Purpose Equipment**

The Government does not allow funds to be used for any general-purpose permanent equipment, i.e., any items that 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.

### **Limitations on Purchase of Equipment**

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

### **USDE 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 2 CFR 200.313 (4)(d)(1). For each item of equipment, the records shall include:

- a) A description of the equipment, including the manufacturer's model number, if any.
- b) An identification number.
- c) Identification of the grant under which the recipient acquired the equipment.
- d) The information needed to calculate the Federal share of the equipment.
- e) Acquisition date and unit acquisition cost.
- f) 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.

### **The USDE Program Officer must approve the disposition of equipment.**

- a) A physical inventory of equipment shall be taken, and the results reconciled with the property records at least once every two (2) years to verify the existence, utilization, and continued need for the equipment. A statistical sampling basis is acceptable. Any discrepancy between quantities determined by the physical inspection and those shown in the accounting records shall be investigated to determine the causes of the discrepancies.
- b) A control system shall be in effect to ensure adequate safeguards are in place to prevent loss, damage, or theft of the equipment. Any loss, damage, or theft of equipment shall be investigated and fully documented.
- c) Adequate maintenance procedures shall be implemented to keep the equipment in good condition.
- d) 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 acquiring and caring for assigned equipment. Any equipment acquisition, disposal, or transfer should be promptly approved by the Project Director and reported to the responsible person in Spelman Technology Services (STS) or the Title III Office.

The College will maintain an inventory of all land, buildings, and equipment purchased with federal funds. Regardless of cost, microcomputers, laser printers, LCD projectors, digital cameras,

laptop computers, firearms, and palm pilots 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**

Upon receipt of new equipment acquired through a Title III grant, the activity is required to:

- Affix a Title III identification tag to the purchased item; Identification tags can be obtained from the Title III Office.

### **Procedures for Disposal of Fixed Assets**

Selling, trading, or deleting any college-owned or non-owned equipment item from the inventory is not within a department head's authority. This responsibility and authority have been assigned to the Vice President of Business and Financial Affairs. This policy also applies to the disposal of 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 three (3) bids in writing. The equipment will be sold to the highest bidder.

### **Surplus Equipment**

When disposing of equipment purchased with Title III funds that become obsolete or no longer in usable condition, the activity follows the procedure below. Property cannot be **disposed of** until the USDE grants permission.

- Business and Financial Affairs must approve the asset's disposition by signing the Property Movement Form.
- Send a copy of the signed Property Disposition Form and copies of all subsequent documentation requested by the Controller's Office confirming the disposal of the item to the Title III Office.
- Once the USDE grants permission, a copy of the completed document will be returned to the department, and the original will be maintained for the Title III official files. The department is then responsible for contacting Facilities Management Services (FMS) to schedule a pickup for disposal items.

### **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 required to file a police report with Spelman's Public Safety Department and provide a copy of the police report to the Project Director and the Office of the Controller no later than three (3) days after the report has been filed with the Public Safety Department. The police report should include all pertinent

information, such as budget account number, Spelman ID number, serial number, and date of theft/loss.

### Loans and Transfers

Equipment is approved for use by the requisitioning activity only and should be moved only if the activity is being moved to a different location. The Project 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 a loan or transfer of equipment from one department to another or 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.
- The department in control of the asset is responsible for completing and submitting the Property Movement Form located on the **eTrieve Dashboard under the Forms Category**. This form should be sent to the Controller's Office to update the College's fixed asset records.

### Identification of Equipment Purchased with Title III Funds

All equipment purchased with Title III funds must be identified by a Spelman College Title III identification tag 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 U.S. Department of Education.

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

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

Requisitions for purchasing all computer and educational technology purchased with Title III funds must use the STS Ship-To code of STSIC. Spelman Technology Services (STS) affixes a Spelman College Title III identification tag to the item and enters the purchase into the STS inventory control system upon receipt of the equipment. **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 STS inventory control system, to initiate the reporting of items lost or stolen, to request to transfer an item to another location or to request disposition of an item, you must complete STS's online Inventory Change and Disposition Form located on the **eTrieve Dashboard under the Forms Category**. For lost or stolen equipment, the activity must also file a report with Spelman's Public Safety Department and

submit a copy of the police report to the Project Director and the Office of the Controller no later than three (3) days after the report has been filed with campus Public Safety. A Title III Equipment Acquisition and Disposition Form containing all the pertinent information should accompany the copy of the police report submitted to the Title III Office.

## **SECTION 6: SUPPLIES**

“Supplies” means all tangible personal property other than equipment. 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 the use of the supplies during the period of grant support. Although there is no requirement for accountability for supplies similar to equipment, the grantee is expected to maintain those records necessary to support the purchase, receipt, and proper charging of supplies following good management practices. **All supplies must be purchased by the end of the second quarter of the grant period (October 1 - March 31).**

## **SECTION 7: 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 Guest Lecturer/Speaker/Facilitator Service Form and submit the form to the Project Director for approval before entering 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 online 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 Form be completed and submitted with a requisition when Title III funds are used to engage a lecturer/speaker/facilitator for more than one (1) day. All requests for the use of lecturers, speakers, and facilitators must be submitted to the Title III Office by March 31 of each grant period, and engagement must be completed by April 20 annually.

### **Payment of Fees**

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 grantor 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 stating the “Scope of Work” and submitted to the Office of Procurement Services, followed by an approved requisition.

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

### Use of College Personnel

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

### Evaluation of Workshops Supported by Title III

Participants should evaluate the effectiveness of workshops sponsored by the Title III 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.

## **SECTION 8: 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 USDE 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 USDE prior approvals for budget and program plan revisions according to 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 (3) months, or a twenty-five percent (25%) 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 per Uniform Guidance 2 CFR 200.308.
- Transfer of funds allotted for personnel, fringes, 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 Project 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 part of the above categories but were not included in the approved budget.

**Note: The above deviations are characterized as a budget justification/revision and are limited to one (1) 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 USDE/Title III Project Director to Redirect the Use of Funds**

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

- a) The budget item to be reduced must be identified, and the reduction fully justified.
- b) The budget items to be increased must be identified along with the amount of the increase and the amount initially approved. The increase must be fully justified.
- c) For USDE requests, the letter of request must be signed by the Project Director of Title III or an official representative of the institution. A request without an official signature will not be processed.
- d) The request must be received at least sixty (60) days prior to the expected implementation date.

### **Budget Revisions**

Budget revisions/justifications that require the 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 to reimburse expenses for entertainment (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.

## **SECTION 9: PROCUREMENT POLICIES AND PROCEDURES**

### **Spelman College Procurement Policies and Procedures**

The College's procurement policy and procedures have been revised to comply with the federal government's Uniform Guidance regulations, effective for grant awards made after December 26, 2014. 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.

In conformity with the Office of Management and Budgets federal guidelines for procurement (2 CFR 200.300), the College will utilize one (1) of five (5) methods for procurement of items purchased with restricted/grant or non-restricted funds. The method of procurement used is based on the type of acquisition. The five (5) methods of procurement are described below:

### **Micro-Purchases**

Procurement by micro-purchases are defined as purchases valued at less than \$3,000 (\$2,000 for the acquisition of 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 taken 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 directly violate 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. Procurement Services provides the College with an online Preferred Vendor list that supports most micro-purchases and streamlines the need to obtain quotes from various outside vendors. The Preferred Vendor list is not sole-sourced but 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 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/three (3) quotes). The Office of Procurement Services can assist in getting quotes and/or sources if necessary.

If an item is valued at \$3,000 but less than \$25,000, and three (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” in the Procurement Policies Procedures and Guidelines Manual located on the Lotus Notes dashboard in the Business and Financial Affairs category as well as ETrieve and upon request).

### **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, 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 (3) known suppliers, and an invitation to make a bid is publicly advertised. Bids solicitations will provide bidders time to prepare bids before 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 procurement method.

### **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 (three (3) bids are required), Procurement Services are available to assist 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 noncompetitive 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 (1) of the following circumstances applies:

- When the supplies or services are available from only one (1) 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 before awarding.

After the number of sources for solicitations is determined inadequate, a Sole Source Justification Document must be submitted with the Banner requisition. This document may be acquired on the eTrieve dashboard.

### 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 alignment 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

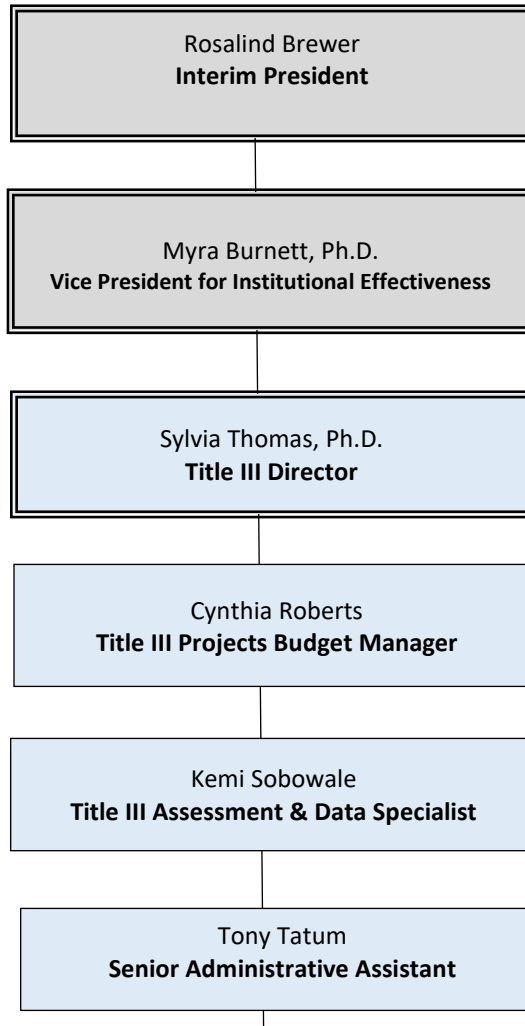
individual is authorized to enter into purchase contracts or in any way obligate the College for procurement indebtedness without approved purchase orders. Such negotiations are considered unauthorized purchases, and the individual entering into these non-authorized activities will be personally responsible 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.

**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.**"

# Spelman College

## Title III Administration Org Chart



# Spelman College Title III Activity Chart

