AP 4010 B - GRANTS & SPONSORED PROJECTS – PROJECT MANAGEMENT AND IMPLEMENTATION

Reference:
2 C.F.R. Part 200

Procedure Statement
Riverside Community College District is committed to the efficient and effective implementation of sponsored agreements on time, within budget and in compliance with sponsoring agency policies, procedures, and requirements.

Procedure Rationale
The effective management of grants and other sponsored projects requires adherence to District/college policy and procedures, the sponsored agreement, sponsoring agency guidance and the funding mandate. Deviation from any of these requirements may result in project delays, an audit finding, and/or the need to return funding to the sponsoring entity.

The District will develop, maintain, and adhere to management practices that comply with state and federal policies and procedures. These will be outlined in RCCD's Grants and Sponsored Projects Administrative Manual, and include:

PROCUREMENT
The District shall develop procurement processes and practices for procuring goods and services needed to carry out sponsored agreements in accordance with AP 5304 Bids and Contracts. AP 5304 incorporates and complies with both state and federal procurement requirements. As appropriate, institutional procurement processes for sponsored agreements may vary if there are more restrictive requirements in the award agreement.

CONFLICT OF INTEREST
Board Policy/Administrative Procedure 1710 Conflict of Interest will apply to all personnel involved in the submission, award, management, and auditing of sponsored agreements received, managed and implemented by the District and its colleges. No Governing Board member, District employee or District representative will participate in the selection, award or administration of a contract supported by extramural funds if they have a real or apparent conflict of interest Likewise, these same individuals are prohibited from soliciting or accepting gratuities, favors or anything of monetary value from contractors or subcontractors unless the gift is an unsolicited item of nominal value.

PERIOD OF PERFORMANCE
The District shall establish operating practices to ensure that all obligations of extramural funds shall occur on or between the beginning and ending dates of the award agreement and

shall be paid no later than 90 days after the end of the funding period unless otherwise specified and/or authorized by the sponsoring agency.

CASH MANAGEMENT

The District shall establish operating procedures regarding cash management, payments and cost transfers in accordance with generally acceptable principles and practices. At a minimum, these practices shall 1) delineate clear separation of duties in the request, authorization, recording, and reconciliation of expenses; 2) ensure that all expenses to sponsored agreements are identifiable; and 3) minimize the time elapsed between the transfer of grant funds to the District and the District's disbursement of funds.

With regard to federal grant funding, to C.F.R. Title 2, Subtitle A, Chapter II, Part 200.305requires that funds are disbursed within three days of transfer. When authorized by the sponsoring agency, the District may receive advance payments of extramural funds. Except under specified conditions, the District shall maintain the advance payments in an interest-bearing account. The District shall track interest earned on the advanced payment and report these earnings to the sponsoring agency as required

In addition, the District shall maintain separate accounts for each sponsored project and document all project expenditures, utilizing accurate and timely accounting records that properly classifies expenditures. All sponsored expenditures shall be reviewed and approved by the project manager prior to obligation. On a regular basis, the project manager shall reconcile all expenditures charged to the sponsored project, noting errors and coordinating with Business Services to transfer costs as required to rectify errors within a reasonable timeframe. The District shall maintain source documentation supporting the expenditure of external grant funds, such as invoices, time sheets, payroll stubs or other appropriate documentation.

USE OF FUNDS

The District shall establish operating procedures to ensure that extramural funding is expended as outlined in the sponsored agreement and that all costs are necessary, allowable, allocable, and reasonable. When required, the District shall seek prior written approval from the sponsoring agency before expending funds in restricted and/or scrutinized areas as outlined in the grant award agreement. The Chancellor or designee shall review and approve all transactions involving extramural funds and shall ensure the proper coding of expenditures consistent with the Budget and Accounting Manual.

TIME AND EFFORT REPORTING

The District shall establish operating procedures to ensure that all District employees who are paid in full or in part with extramural funds document the amount of time they spend on activities related to the sponsored program This shall include any employee whose salary is not paid with extramural funds but whose time and effort is used to meet a required match or in-kind contribution to a sponsored project.

SUBAWARD MONITORING

The District shall establish operating procedures for the development and monitoring of subaward agreements that ensure compliance with sponsoring agency requirements. At a minimum, the District shall ensure that subrecipients comply with the requirements of the sponsored agreement with regard to use of funds, expense documentation, procurement practices, prior approval mandates, and financial management standards.

AUDITS

The District shall establish operating procedures to ensure compliance with state and federal audit requirements.

Specified records pertaining to the audit of federal funds expended by the District shall be transmitted to the Federal Audit Clearinghouse operated by the U.S. General Services Administration and shall be made available for public inspection. Such records shall be transmitted within 30 days after receipt of the auditor's report or within nine months after the end of the audit period, whichever is sooner, unless a longer period is agreed to in advance by the federal agency or a different period is specified in a program-specific audit guide. (2 C.F.R. Section 200.512)

In the event that the annual audit or any other audit identifies a deficiency, the Chancellor or designee shall promptly act to correct the identified deficiency, produce recommended improvements, and/or demonstrate that the audit finding is invalid or does not warrant action. (2 C.F.R. Sections 200.26, 200.508, 200.511)

RECORDS RETENTION

The District shall establish operating practices to ensure compliance with sponsoring agency record retention requirements.

GRANTS AND SPONSORED PROJECT ADMINISTRATIVE MANUAL

RCCD will develop and maintain an up-to-date Grants and Sponsored Project Administrative Manual that provides an in depth description of the operating procedures outlined with this procedure, reflects current effective management practices, aligns with District and state budget and accounting policies and practices, and offers guidance and support to project managers with regard to District processes and procedures for implementation of sponsored projects.

Office of Responsibility: Vice Chancellor, Institutional Advancement & Economic Development
Vice Chancellor, Business and Financial Services

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Formerly: AP 4010[E] and 3285