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**AUTHORITY**

Navarro College, Board Policies and Procedures - [Section CAI “Grants, Funds, Donations;”](https://www.navarrocollege.edu/boardpolicies/section-c/section-cai.html) [Section CC.1 “Annual Operating Budget;”](https://www.navarrocollege.edu/boardpolicies/section-c/section-cc-1.html) [Section CE.6 “Supplement Not Supplant;”](https://www.navarrocollege.edu/boardpolicies/section-c/section-ce-6.html) “[Section CD. 3 “Fixed Assets;”](https://www.navarrocollege.edu/boardpolicies/section-c/section-cd-3.html) [“Section CD.8 Travel Procedures;”](https://www.navarrocollege.edu/boardpolicies/section-c/section-cd-8.html) “[Code of Federal Regulations](https://www.ecfr.gov/current/title-2/subtitle-A/chapter-II/part-200?toc=1) (CFR),” and “[Texas Grant Management Standards](https://comptroller.texas.gov/purchasing/grant-management/) (TxGMS).”

**PROCEDURE STATEMENT**

The purpose of this procedure is to establish guidelines for seeking, applying for, receiving, and managing grants at Navarro College.

Navarro College will follow Code of Federal Regulations, Uniform Guidance 2 CFR Part 200 for applicable federal grant programs, and TxGMS for applicable state grant programs.

These processes apply to all college personnel involved in grant-seeking, proposal development, implementation, and reporting processes. This document compiles current Navarro College Policies and Procedures, Federal, and State grant regulations for the purpose of creating a grant manual.

This procedure aims to ensure consistent and transparent practices throughout the grant lifecycle.

**ROLES AND RESPONSIBILITIES**

The District President is the Signatory Authority or Authorized Representative for the institution and must approve all grant applications prior to submission and sign all grant contract documents or notice of grant awards.

The Comptroller is the Certifying Official for the institution and must review, approve, and certify to the accuracy of grant reports submitted on behalf of the institution when required.

Vice President’s, Department Heads, and Deans who choose to pursue grant opportunities will ensure that proposed projects align with the college's mission and goals.

The Director of Grants is responsible for overseeing the grant process, including identification of funding opportunities, proposal development, and compliance.

The Grant Writer will be whoever the primary person is that will complete the grant application, this should be a subject matter expert familiar with the program and its needs.

The Grant Manager will be the person who will be primarily responsible for the planning and implementation of the grant program. They will oversee all of the goals and objectives and ensure the grant project is meeting necessary milestones.

Grant Proposal Development Teams will be formed as needed, consisting of relevant faculty, staff, administrators, and subject matter experts. This team will write and prepare all application documents in conjunction with the Office of Grant Management who will provide guidance and oversight.

The Office of Grant Management in partnership with the Business Office will also provide oversight of budget development, financial reporting, and compliance.

**NAVARRO COLLEGE FOUNDATION**

The Foundation was established in 1974 as a non-profit 501 (c)(3) to allow donors to make tax-deductible contributions in support of Navarro College scholarships, financial aid for needy students, faculty development, improve facilities, and support for academic, athletic, community and student projects at the College.

Any Grant Manager’s seeking to apply for a grant under the foundation’s non-profit status must coordinate this through the Office of Grant Management who will review the grant opportunity with the Foundation Director. If the Foundation Director agrees that the proposal aligns with the foundation’s mission and goals, then procedures for the grant application process will proceed.

**GRANT DEVELOPMENT**

The Director of Grants will communicate funding opportunities to relevant departments through the institution’s Vice Presidents, as they become available. Departments and Divisions are encouraged to research and seek out funding opportunities on their own but must inform the Office of Grant Management of any intent to apply for a grant funding opportunity.

Consortium/Partnership grants or sub-award grants in which Navarro College is not the lead applicant must be approved by the applicable Vice President, Department Head and/or Dean, and the District President. Proposal development will be coordinated by the project’s Grant Manager and the Office of Grant Management.

A *Grant Project/Approval to Apply Request Dynamic Form* must be submitted and approved through all the required personnel in order to proceed with application preparation or partnership agreement. If not approved, then the grant application/partnership does not have authorization to proceed.

**Form Template:**

*Grant Project/Approval to Apply Request Form*

For Non-Single Sign on Forms:

<https://dynamicforms.ngwebsolutions.com/Submit/Start/00c30d8d-7245-4799-8416-82236a5013a4?SSO=N>

For Single Sign on Forms:

<https://federation.ngwebsolutions.com/sp/startSSO.ping?PartnerIdpId=https://navarro.onbio-key.com&TargetResource=https%3a%2f%2fdynamicforms.ngwebsolutions.com%2fSubmit%2fStart%2f00c30d8d-7245-4799-8416-82236a5013a4>

**PROPOSAL DEVELOPMENT, GRANT REVIEW, AND SUBMISSION**

Grant proposals must align with the college's strategic plan and demonstrate clear objectives, activities, outcomes, and budget details.

Proposals will be reviewed internally for accuracy, coherence, and alignment with the funding agencies’ requirements. The project’s Grant Manager, the Office of Grant Management, and the applicable Vice President will all review the drafted application documents and provide notes/comments before submission. Adequate time must be given for review by department proposing the grant project.

The Director of Grants will ensure timely submission of complete proposals to funding agencies.

**BUDGET MANAGEMENT**

Budget means the financial plan for the award that the awarding agency or pass-through entity approves during the award process or in subsequent amendments to the award. Budgets must accurately reflect approved/allowable project costs and adhere to grantor guidelines and institutional policies. Appendices D & E are templates that can be utilized by Grant Managers or Project Directors to build a proposed budgets and calculate salaries and benefits.

The Office of Grant Management and the Business Office must approve proposed grant budgets prior to application or renewal submissions and will monitor grant expenditures to ensure compliance within the approved budget. Unless otherwise specified by the grant program, indirect costs will be charged to applicable grants at the [de minimis rate of 10%](https://www.ecfr.gov/current/title-2/subtitle-A/chapter-II/part-200/subpart-E/subject-group-ECFRd93f2a98b1f6455). Navarro College will supplement not supplant funds in accordance with board policies and procedure [section CE.6 “Supplement Not Supplant.”](https://www.navarrocollege.edu/boardpolicies/section-c/section-ce-6.html)

Supplement, not supplant is a provision common to many federal statutes authorizing education grant programs. The purpose of a supplement, not supplant provision is to help ensure that federal grant funds are expended to expand or increase the level of services, rather than being diverted to cover expenses that the institution would have paid out of other funds in the event the federal funds were not available.

Navarro College is responsible for ensuring that expenditures are not made for unauthorized or non-allowable purposes.

If a grant application requires an in-kind or cash match, the Grant Managers or Project Directors are responsible for budgeting and tracking these expenses (see Appendix A.).

If a grant application is seeking funding for technology items or equipment, the Chief Information Officer must be notified and approve of the items prior to application submission. If allowable under the grant, infrastructure upgrades may be necessary and added to the grant budgets to support the requested items or equipment.

Disbursements of grant funds occur either as a reimbursement or an advance. Under the reimbursement method, the grantee is repaid for money spent on allowable expenses through monthly/quarterly/or annual reporting. In contrast, the advance method of funding provides that grant funds are disbursed in advance of the grantee incurring expenses.

**TRAVEL**

Employees traveling under contracts and grants (federal, state, local, or private) shall be reimbursed for travel expenses and allowances on the same basis as other College employees, except in those instances where the terms of the contract or grant specify travel guidelines and reimbursement rates which are more restrictive than the College reimbursement rates. <https://www.navarrocollege.edu/boardpolicies/section-c/section-cd-8.html>

It is unallowable for Federal funds to pay for gratuities.

**CAPITAL OR FIXED ASSETS PURCHASED WITH GRANT FUNDS**

The Director of Grants will comply with [2 CFR 200.313(c)(1)(i) and (ii) and 200.313 (d)](https://www.ecfr.gov/current/title-2/subtitle-A/chapter-II/part-200/subpart-D/subject-group-ECFR8feb98c2e3e5ad2/section-200.313) and will contact the awarding agency for specific disposal instructions for disposal of equipment purchased with federal funds.

Equipment must be used by the program or project for which it was acquired as long as needed, whether or not the project or program continues to be supported by the award. When no longer needed for the original program or project, the equipment may be used in other activities supported by the awarding agency.

Property records must be maintained that include a description of the property, a serial number or other identification number, the source of funding for the property, who holds title, the acquisition date, and cost of the property, percentage of state participation in the project costs for the state award under which the property was acquired, the location, use and condition of the property, and any ultimate disposition data including the date of disposal and sale price of the property.

A physical inventory of the property must be taken, and the results reconciled with the property records at least once every two years, and more frequently if required by statute or the award.

The Office of Grant Management and the Business Office will be notified before taking any action on fixed assets that are purchased with grant funds that are deemed to be lost, damaged, destroyed, or scheduled for disposal. <https://www.navarrocollege.edu/boardpolicies/section-c/section-cd-3.html>

**GRANT AWARD AND ACCEPTANCE**

The Director of Grants will facilitate the acceptance of grant awards and coordinate necessary documentation and signatures. Award notifications and terms will be communicated to relevant departmental stakeholders and the Business Office.

Awarded funds will not be available or finalized in the accounting system until a Notice of Grant Award (NOGA) has been fully executed and an approved budget has been recorded in the Business Office and Office of Grant Management.

**GRANT IMPLEMENTATION**

The Grant Manager and Grant Project teams will create detailed implementation plans, outlining tasks, timelines, and responsibilities. These key personnel identified in the grant proposal will be responsible for any project planning phases, assigning project responsibilities, setting milestones, and establishing reporting mechanisms to ensure compliance. These key personnel will also be required to track project progress and outcomes as defined by the granting agency.

Copies of all programmatic progress reports will be submitted to the Director of Grants.

**REPORTING AND COMPLIANCE**

Navarro College is responsible for oversight of the operations of the grant award supported activities. The designated Grant Manager or Project Director must monitor activities under grant award guidelines to ensure compliance with applicable requirements and performance expectations are being achieved. All interim and final reports will be prepared according to funder requirements and submitted on time. In the event the Grant Manager or Project Direct positions become vacant reporting compliance will become the responsibility of the direct supervisor of those positions or the Vice President over the grant program. Repeated failure to meet reporting deadlines will result in meetings with Department Heads, Deans, or the Vice Presidents to create an action plan to ensure future compliance. The District President will be notified should reporting failure continue after the action plan is in place.

The Office of Grant Management will coordinate with the Grant Manager to monitor, assist, or provide financial reporting to the grant awarding agencies as required for compliance and reimbursement. Grant Mangers and Project Directors will prepare and submit all programmatic reports. All required reports will be reviewed by the Office of Grant Management prior to submission.

The Business Office will verify/certify these financial reports and complete any necessary drawdowns and/or refunds to the applicable granting agencies.

The Director of Grants will ensure compliance with all grant funder regulations and guidelines.

Appendix C has been developed as a best practices checklist to ensure grant compliance, and prepare Grant Managers or Project Directors for an audit.

**GRANT EXTENSIONS**

A grant extension provides for additional time during the grant project period and/or budget period to complete the work of the grant. Typically, these come at no additional cost to the institution. If project work is ongoing and funds remain available to cover project expenses, requesting an extension of the project period may be appropriate.

Grant Managers seeking a no cost extension on any grant project they oversee must notify the Office of Grant Management and the Business Office in writing prior to requesting it from the granting agency. Once the extension has been granted a modified NOGA must be sent to these offices immediately after receipt.

**GRANT CLOSEOUT**

The Director of Grants, the Business Office, and the Grant Managers will coordinate the closeout process, including final reports and financial reconciliations.

Navarro College shall submit, within 30/60/90 (however specified by grant award) calendar days after the date of completion of the award, all financial, performance, and other reports as required by the terms and conditions of the award.

Unless a granting agency authorizes an extension, Navarro College shall liquidate all obligations incurred under the award no later than 30/60/90 (however specified by grant award) calendar days after the funding period or the date of completion as specified in the terms and conditions of the award or in agency implementing instructions.

Navarro College shall promptly refund any balances of unobligated cash that a granting agency has advanced or paid and that is not authorized to be retained for use in other projects.

**RECORD KEEPING**

All grant-related documents, including proposals, reports, and correspondence, will be retained and disposed as per the college's record-keeping policy (After Close + 3 years). For best practices regarding records management refer to Appendix B.

**TEMPLATES AND RESOURCES**

Sample templates and external resources will be provided to assist with proposal development and management.

**REVIEW AND REVISION**

This policy will be reviewed by the Office of Grant Management, at a minimum of every two years or as needed, to ensure alignment with changing regulations and best practices.

**APPENDICIES**

1. In Kind or Cash Match Tracking Document
2. Grant Records Management Best Practices
3. Grant Monitoring Checklist
4. Grant Budget Template
5. Salary and Benefits Calculator

**Appendices**

**In-Kind/Cash Match Contribution Documentation Form**

**Personnel**

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| **Personnel Name** | **Activity** | **Account #** | **Date** | **Hours** | **Total Value** |
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| **Total for Month** |  |  |  |  | **$** |

**Signature of Person Completing Report:\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_Date:\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_**

**Travel**

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| **Date** | **Personnel Name** | **Position** | **Account #** | **Destination** | **Total Cost** |
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**Explanation of Travel:**

**Signature of Person Completing**

**Report:\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_Date:\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_**

**Equipment**

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| **Location** | **Fixed Asset Tag#** | **Use** | **Account #** | **Description** | **Total Value** |
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**Explanation of Equipment:**

**Signature of Person Completing**

**Report:\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_Date:\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_**

**Materials/Supplies**

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| **Date** | **Description** | **Account #** | **Value** | **Total Cost** |
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**Explanation of Material/Supplies:**

**Signature of Person Completing**

**Report:\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_Date:\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_**

**Consultants/Contracts**

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
| **Date** | **Name** | **Description of Activity** | **Number of Days** | **Daily Rate** | **Account#** | **Total Cost** |
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**Explanation of Consultants/Contracts:**

**Signature of Person Completing**

**Report:\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_Date:\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_**

February 6, 2023

To: All Grant Managers of Navarro College

From: Aspen Douglas, Director of Grants

Re: Grant Records Best Practices

Each Grant Manager should maintain the following records either in electronic or physical format for the purpose of grant management for each grant program they oversee. In the event of a desk audit by a granting agency it is important to know where these records are and to have them easily accessible.

Records Management:

* Copy of the original solicitation and any updates or amendments\*
  + (Request for Proposals, Notice of Funding Announcement, or Solicitation for Grant Award)
* Grant Proposal/Application\*
  + Narrative
  + Budget
  + Any required attachments
* Notice of Grant Award\*
  + Copy of Grant Agreement or Cooperative Agreement
  + Amendments
* Budget Documents\*
  + Original Budget
  + Supplemental Funds received (if applicable)
  + Budget Revisions or Amendments and approval documentation from granting agency
* Reports
  + Quarterly, Semi-annual or annual reports
    - Performance Activity Reports
    - Financial Reports
* Receipts
  + Copies of invoices for major purchases (capital items, equipment, etc.)
  + Copies of invoices for cash match requirement items (when applicable)
* Procurement documentation and selection process
* Time sheets, certifications, or time allocation documents (for grant funded personnel)
* Relevant agency policies
  + Travel policies
  + Purchasing Policies
  + P-Card Policies
* Evaluation or Performance Measure content
* Correspondence
  + Letters
  + Emails

All these records should be maintained and easily accessible by the grant manager and their direct supervisor and/or Vice President. If these files will be maintained electronically be sure you are not the only person who has access to them. If these files will be maintained physically, ensure all key grant personnel know where to find the binder or folder where they are kept.

*\*These items should also be forwarded to the Office of Grant Management for their records*







