

CLARK ATLANTA UNIVERSITY

TITLE III PROGRAM ADMINISTRATION POLICY AND PROCEDURES HANDBOOK



CLARK ATLANTA UNIVERSITY		
POLICY & PROCEDURE HANDBOOK	Subject: Policies and Procedures that will ensure the Title III Grant is administered in compliance with Federal and University regulations.	
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1.0

PREFACE

THE TITLE III PROGRAM ADMINISTRATION POLICIES AND PROCEDURES HANDBOOK IS PREPARED TO FACILITATE THE IMPLEMENTATION OF ACTIVITIES FUNDED BY TITLE III PROGRAMS. THIS HANDBOOK DOES NOT EXCLUDE COMPLIANCE TO UNIVERSITY POLICIES AND PROCEDURES. IT IS DESIGNED TO PROVIDE SPECIFIC POLICIES AND PROCEDURES UNIQUE TO THE TITLE III PROGRAMS, TO SUPPORT THE PROPER MONITORING AND EVALUATION OF PROGRAM ACTIVITIES AND TO ENSURE THE APPROPRIATE EXPENDITURE OF PROGRAM FUNDS. THIS HANDBOOK SERVES AS A RESOURCE DOCUMENT IN CARRYING OUT THE APPROVED PLAN OF OPERATION.

COMPLIANCE WITH THE GUIDELINES AND REGULATIONS INCLUDED IN THIS HANDBOOK WILL ENSURE THAT THE FEDERAL GRANTS ARE ADMINISTERED IN ACCORDANCE WITH TITLE III, PART B OF THE 1965 HIGHER EDUCATION ACT, THE UNIFORM GUIDANCE, PART 200, AND OTHER FEDERAL DIRECTIVES, AND AFFIRMS THAT CLARK ATLANTA UNIVERSITY HAS THE DOCUMENTATION NECESSARY TO SHOW COMPLIANCE.

THIS HANDBOOK WILL BE UPDATED AS CHANGES IN POLICIES ARE MADE BY THE U. S. DEPARTMENT OF EDUCATION AND/OR CLARK ATLANTA UNIVERSITY. THIS POLICIES AND PROCEDURES HANDBOOK IS EFFECTIVE UNTIL REPLACED BY AN UPDATED VERSION OR REVISED INSERTIONS.

2.0

INTRODUCTION

2.1 PURPOSE

Title III of the Higher Education Act of 1965, as amended, Strengthening Historically Black Colleges and Universities (HBCU), Strengthening Historically Black Graduate Institutions (HBGI) and Student Aid and Fiscal Responsibility Act (SAFRA) Programs, authorizes special assistance to strengthen the quality of developing institutions which have the desire and potential to make a substantial contribution to the higher education resources of the nation. Amendments to the Act have altered some elements of the program, but it remains as written - an instrument to provide assistance to institutions demonstrating a constructive effort to strengthen themselves.

Clark Atlanta University's Title III Program has funded project activities designed to help meet various strategic goals of the University.

2.2 LEGISLATIVE ALLOWABLE ACTIVITIES (LAA) THAT QUALIFY FOR TITLE III HBCU FUNDING

- 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 classrooms, libraries, laboratories, and other instructional facilities, including purchase or rental of telecommunications and technology equipment or services.
- 3) Support of faculty exchanges, faculty development, and faculty fellowships to assist in attaining advanced degrees in the field of instruction of the faculty.
- 4) Academic instruction in disciplines in which Black Americans are underrepresented.
- 5) Purchase of library books, periodicals, and other educational materials, including telecommunications program materials.
- 6) Tutoring, counseling, and student service programs designed to improve academic success.
- 7) Funds management, administrative management, and acquisition of equipment for use in strengthening funds management.
- 8) Joint use of facilities, such as laboratories and libraries.
- 9) Establishing or improving a development office to strengthen or improve contributions from alumni and the private sector.
- 10) Establishing or enhancing a program of teacher education designed to qualify students to teach in a public elementary or secondary school in the State that shall include, as part of such program, preparation for teaching certification.

- 11) Establishing community outreach programs which will encourage elementary and secondary students to develop the academic skills and the interest to pursue postsecondary education.
- 12) Establishing or improving an endowment fund.
- 13) Acquisition of real property in connection with the construction, renovation, or addition to or improvement of campus facilities.
- 14) Education or financial information designed to improve financial literacy and economic literacy of students or the students' families, especially with regard to student indebtedness and student assistance programs under title IV.
- 15) Services necessary for the implementation of projects or activities that are described in the grant application and that are approved, in advance, by the Secretary, except that not more than two percent of the grant amount may be used for this purpose.

2.3 LEGISLATIVE ALLOWABLE ACTIVITIES (LAA) THAT QUALIFY FOR TITLE III HBGI FUNDING

- 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 classrooms, libraries, laboratories, and other instructional facilities, including purchase or rental of telecommunications and technology equipment or services.
- 3) Purchase of library books, periodicals, technical and other scientific journals, microfilm, microfiche, and other educational materials, including telecommunications program materials.
- 4) Scholarships, fellowships and other financial assistance for needy graduate and professional students to permit the enrollment of the students in and completion of the doctoral degree in medicine, dentistry, pharmacy, veterinary medicine, law, and the doctorate degree in the physical or natural sciences, engineering, mathematics, or other scientific disciplines in which African Americans are underrepresented.
- 5) Establishing or improving a development office to strengthen or improve contributions from alumni and the private sector.
- 6) Assisting in the establishment or maintenance of an institutional endowment fund.
- 7) Funds and administration management, and the acquisition of equipment, including software, for use in strengthening funds, management and management information systems.
- 8) Acquisition of real property that is adjacent to the campus in connection with the construction, renovation, or addition to or improvement of campus facilities.

- 9) 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 under title IV of the HEA.
- 10) 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.
- 11) Tutoring, counseling, and student services programs designed to improve academic success

2.4 LEGISLATIVE ALLOWABLE ACTIVITIES THAT QUALIFY FOR TITLE III SAFRA FUNDING

- 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 classrooms, libraries, laboratories, and other instructional facilities, including purchase or rental of telecommunications and 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.
- 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.

Other activities proposed in the application submitted under subsection (d) that - (A) contribute to carrying out the purposes of this part; and (B) are approved by the Secretary as part of the review and acceptance of such application.

The full citation for the HBCU and HBGI programs can be found in 34 CFR, Parts 608,609 and the Higher Education Act of 1965 as amended by the Higher Education Opportunity Act of 2008 (P.L. 110-).

2.5 RELATIONSHIP TO UNIVERSITY MISSION

The University in its mission statement has committed itself to the role of shaping graduates who will not only be productive, creative, socially and economically responsible citizens, but students who will also have met standards of excellence in contemporary higher education.

Clark Atlanta University prepares its students for leadership and service through instructional programs and extracurricular activities that:

- Develop skills in oral and written communication, analytical and critical thinking, and interpersonal relationships;
- Foster an understanding and appreciation of the elements and evolution of various cultures, and the nature of the physical universe;
- Foster understanding and appreciation of the specific knowledge and skills needed for the pursuit of professional careers and /or graduate study; and
- Cultivate the personal attributes of self-confidence, tolerance, morality, ethical behavior, humility, global perspective, and a commitment to social justice.

In carrying out its primary mission of developing students with disciplined minds who will lead lives of leadership, service, and self-realization, CAU is guided by an administration and faculty who promote academic excellence, achievement, and high ideals. The activities requested for support under Title III were developed with the mission, purposes and goals of the University in mind. Each activity is governed by a set of objectives, and each objective is related specifically to one or more of the Institution's long-range goals. In order to ensure its continued success and the implementation of all planned activities, Title III Program Administration will:

- Recommend policies and develop procedures to ensure adherence to Federal regulations that provide a clear audit trail;
- Provide support services to facilitate maximum implementation of funded activities;
- Recommend policies and develop procedures to facilitate Title III proposal development and submission;
- Recommend changes to Activities which will enhance the program in line with expected goals and objectives.

2.6 USING THIS HANDBOOK

This Policies and Procedures Handbook provides guidance and compliance directives on the implementation of the Title III Programs at Clark Atlanta University (CAU). These programs are designed to help strengthen and advance CAU with the goal of making it one of the nation's finest private research universities. It contains important information on grant terms and conditions for improving programs and services of the University using support from the Title III Programs.

Procedures for Title III funded activities follow the approved policies and practices of Clark Atlanta University. Clark Atlanta University's Title III Program Administration Office is responsible for monitoring the completion of all activity objectives, tasks, evaluation of projects according to the approved Plan of Operation as well as being responsible for ensuring compliance. As a Department of Education grantee, CAU is bound by Federal rules and regulations. Continued funding of the Title III Programs requires full compliance with applicable Federal regulations.

In support of our compliance efforts, this Handbook provides assistance to Activity Directors and other key personnel in carrying out the objectives and implementation strategy of the approved Plan of Operation. It is to be used as a guide for ensuring adherence to all guidelines and regulations listed.

As grant requirements change, revisions or additions to this Handbook will be necessary to ensure compliance. All Activity Directors and supporting staff must become familiar with the grant requirements included herein, all administrative procedures and ensure that policies and procedures are adhered to. Questions concerning Title III matters should be directed to Title III Program Administration Office.

*(*Uniform Guidance 2 CFR Part 200)*

3.0

TITLE III PROGRAM ADMINISTRATIVE STRUCTURE

3.1 POSITIONS AND TITLE

Overall leadership responsibility for CAU Title III Programs is vested in the position of the Director. All Title III Program Administration staff report directly to the Director; these positions provide programmatic, fiscal, administrative and clerical support to the Program. On occasions the office may include student workers and in such cases, the Office Manager will supervise those individuals.

A brief description of each position is as follows:

DIRECTOR: The Title III Director is responsible for the overall implementation of the policies and procedures of the program and for ensuring conformance with all applicable Federal and University regulations. The Director ensures that the President's vision and priorities are reflected in all activities approved for funding, and serves as the President's official agent on all Title III Program matters.

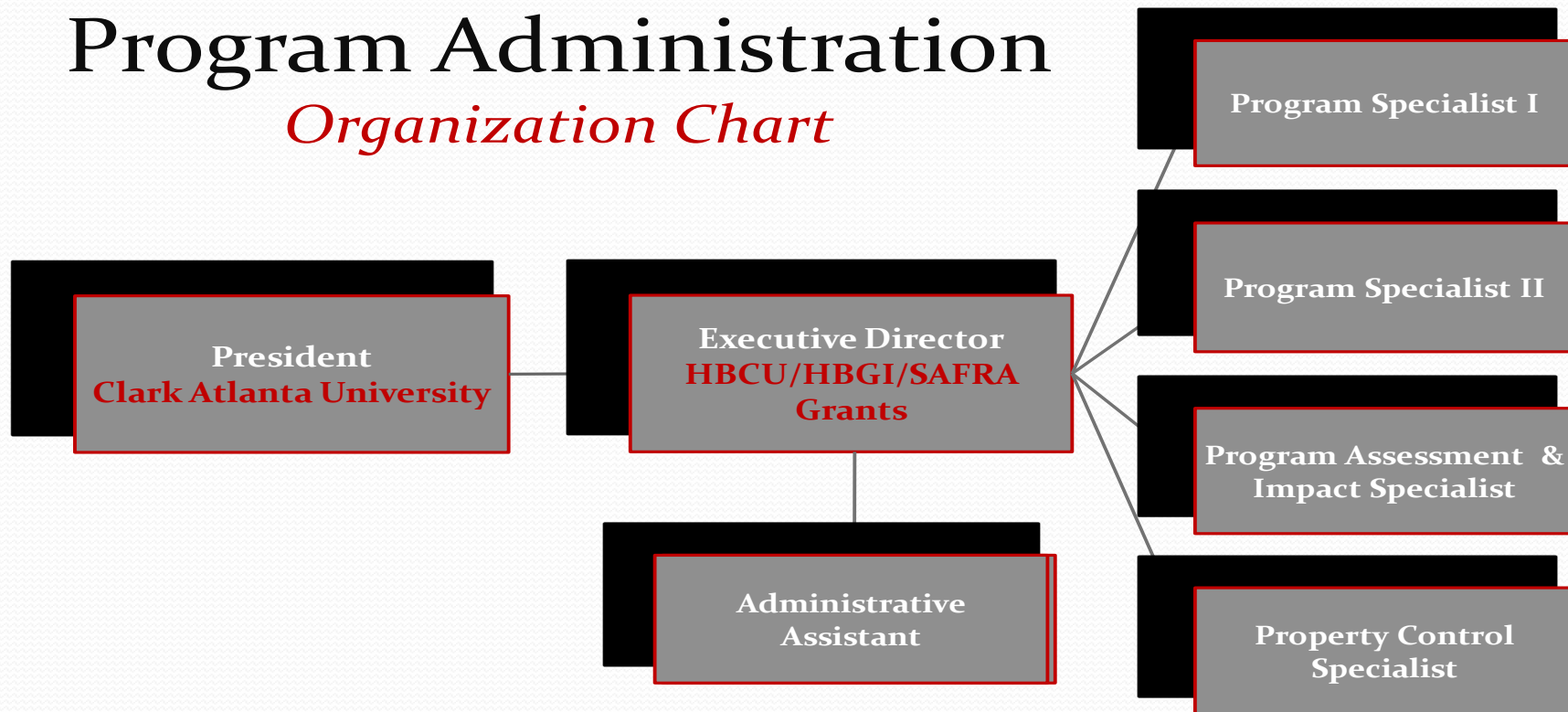
ADMINISTRATIVE ASSISTANT: The Title III Administrative Assistant is responsible for ensuring effective office operations and assisting with the successful implementation of CAU Title III Programs. Some duties associated with this position include; processing forms, maintenance of records, responding to inquiries, preparing reports, training staff and coordinating meetings.

PROGRAM SPECIALIST(S): The Title III Program Specialists are responsible for assisting with the coordination of program monitoring and evaluation of Title III funded programs. Also associated with this position is the coordinating of training and development for unique Title III Technical Workshops held at the University. This position serves to establish a system for providing daily assistance to Title III Activity Directors and their staff to ensure compliance to University and Federal regulations.

Title III Program Administration

Organization Chart

Title III Program Administration *Organization Chart*



4.0

PROGRAM ACCOUNTABILITY AND EVALUATION

4.1 OVERVIEW OF TITLE III GRANT MANAGEMENT

- **Coordination:** Each activity shall be developed so as to be in coordination, to the extent feasible, with other programs at the University with similar educational purposes. A common effort should be demonstrated in the coordination of each activity. All Activity Staff are responsible for assisting the Activity Directors with the daily operations of the activities. Such coordination shall continue during the period in which such project remains in effect.
- **Evaluation:** As part of the Phase II Plan, each activity shall include procedures to effectively evaluate the progress on stated objectives. All activities are evaluated annually by External Evaluators.
- **Site Visit:** Site visits may be made by representatives of the Department of Education to review program accomplishment, management control systems and make recommendations as needed.
- **Monitoring by Recipients:** Internal site-visits will be conducted by Title III Program Specialists. Grantees shall constantly monitor the performance under federally supported Activities to assure that adequate progress is being made toward achieving the goals of the Activity. Monitoring of the Activities by the Title III Office will include: an overview of the progress of each activity in accomplishing the goals on the timetables that have been established; a review of the monthly Time and Effort Reports submitted by each employee that receives compensation under the program; an audit of all equipment and inventory; periodic monitoring of activity expenditures to ensure funds are spent efficiently and effectively. This review shall be made for each function or Activity as set forth in the approved grant application or contract document.
- **Records Related to Grant Funds:** A grantee shall keep records that fully show: (a) the amount of funds under the grant; (b) how the grantee uses the funds; (c) the total cost of the project; and (d) the share of the cost provided from other sources. Further, poor record-keeping is a lack of internal controls and should not occur.
- **Records Related to Compliance:** A grantee shall keep records to show its compliance with program requirements. Compliance encompasses the processes of systematic procedures that are organized and efficient methods; that will, ensure that the provisions of the regulations imposed by a **federal** agency are appropriately met.
- **Records Related to Performance:** A grantee shall keep records to identify significant project experiences and results and use the records to (a) determine progress in accomplishing project objectives; and (b) revise those objectives, if necessary. Accurate records will document successes, problems encountered, and time frames in the delivery of the desired outcomes and/or results.

Records Retention Period: Financial records, supporting documents, statistical records, and all other records pertinent to an award shall be retained for a period of three years from the date of submission of the final expenditure report or, for awards that are renewed quarterly or annually, from the date of the submission of the quarterly or annual financial report, as authorized by the Federal awarding agency. The only exceptions are the following:

- (a) If any litigation, claim, or audit is started before the expiration of the 3-year period, the records must be retained until all litigation, claims, or audit findings involving the records have been resolved and final action taken.
- (b) When the non-Federal entity is notified in writing by the Federal awarding agency, cognizant agency for audit, oversight agency for audit, cognizant agency for indirect costs, or pass-through entity to extend the retention period.
- (c) Records for real property and equipment acquired with Federal funds must be retained for 3 years after final disposition.
- (d) When records are transferred to or maintained by the Federal awarding agency or pass-through entity, the 3-year retention requirement is not applicable to the non-Federal entity.
- (e) Records for program income transactions after the period of performance. In some cases recipients must report program income after the period of performance. Where there is such a requirement, the retention period for the records pertaining to the earning of the program income starts from the end of the non-Federal entity's fiscal year in which the program income is earned.
- (f) Indirect cost rate proposals and cost allocations plans. This paragraph applies to the following types of documents and their supporting records: indirect cost rate computations or proposals, cost allocation plans, and any similar accounting computations of the rate at which a particular group of costs is chargeable (such as computer usage chargeback rates or composite fringe benefit rates).

When original records are electronic and cannot be altered, there is no need to create and retain paper copies. When original records are paper, electronic versions may be substituted through the use of duplication or other forms of electronic media provided that they are subject to periodic quality control reviews, provide reasonable safeguards against alteration, and remain readable.

Extensions and Unexpended Funds: d) Except for requirements listed in paragraph (c)(1) of this section, the Federal awarding agency is authorized, at its option, to waive prior written approvals required by paragraph (c) this section. Such waivers may include authorizing recipients to do any one or more of the following:

(1) Incur project costs 90 calendar days before the Federal awarding agency makes the Federal award. Expenses more than 90 calendar days pre-award require prior approval of the Federal awarding agency. All costs incurred before the Federal awarding agency makes the Federal award are at the recipient's risk (i.e., the Federal awarding agency is under no obligation to reimburse such costs if for any reason the recipient does not receive a Federal award or if the Federal award is less than anticipated and inadequate to cover such costs). See also §200.458 Pre-award costs.

(2) Initiate a one-time extension of the period of performance by up to 12 months unless one or more of the conditions outlined in paragraphs (d)(2)(i) through (iii) of this section

apply. For one-time extensions, the recipient must notify the Federal awarding agency in writing with the supporting reasons and revised period of performance at least 10 calendar days before the end of the period of performance specified in the Federal award. This one-time extension may not be exercised merely for the purpose of using unobligated balances. Extensions require explicit prior Federal awarding agency approval when:

- (i) The terms and conditions of the Federal award prohibit the extension.
 - (ii) The extension requires additional Federal funds.
 - (iii) The extension involves any change in the approved objectives or scope of the project.
- (3) Carry forward unobligated balances to subsequent periods of performance.

Termination and Suspension for Cause: Awards may be terminated in whole or in part as follows:

- (1) By the Federal awarding agency or pass-through entity, if a non-Federal entity fails to comply with the terms and conditions of a Federal award;
- (2) By the Federal awarding agency or pass-through entity for cause;
- (3) By the Federal awarding agency or pass-through entity with the consent of the non-Federal entity, in which case the two parties must agree upon the termination conditions, including the effective date and, in the case of partial termination, the portion to be terminated; or
- (4) By the non-Federal entity upon sending to the Federal awarding agency or pass-through entity written notification setting forth the reasons for such termination, the effective date, and, in the case of partial termination, the portion to be terminated. However, if the Federal awarding agency or pass-through entity determines in the case of partial termination that the reduced or modified portion of the Federal award or subaward will not accomplish the purposes for which the Federal award was made, the Federal awarding agency or pass-through entity may terminate the Federal award in its entirety.

4.2 ACTIVITY DIRECTORS / ACTIVITY ASSISTANTS

Activity Directors are responsible for carrying out the approved program plan of operation contained in the funded Title III Proposal and for achieving the identified objectives in their respective activities. In some instances, Activity Directors may delegate the day-to-day administration of these responsibilities to a staff member under their direct supervision. This individual is the Activity Assistant. Only Activity Directors and Activity Assistants may initiate requests for use of funds and their requests must be based upon the approved budget. Each Activity Assistant must have requests approved by the Activity Director within the existing administrative structure of the University before the requests are submitted to the Title III Program Office.

Activity Directors / Activity Assistants have the following responsibilities:

- Attend on-campus Title III meetings; receive pertinent grant information.

- Prepare complete and accurate reports of Activity progress for submission to the Title III Program Administration Office (i.e., quarterly activity performance report; Annual Performance Report (APR)*; related travel reports; time and effort reports and equipment inventories).
- Monitor and report the timely completion of assigned Activity tasks and milestones.
- Request Title III funds in accordance with approved Activity allocations and University procedures.
- Approve travel requests.
- Prepare, review, and sign Time and Effort reports.
- Develop strategies for the completion of objectives in a timely manner.
- Monitor Activity budgets, and sign-off on **all** approved budget expenditures.
- Provide Title III Program Administration with a copy of all HR personnel forms for all Title III funded personnel on each person hired and/or terminated who receives salaries under Title III.
- Perform other duties, which may be necessary to ensure that objectives of the Activity are achieved.

Activity Directors and/or Assistants will receive a performance evaluation annually based on the following:

- Attendance at meetings
- Timely submission of reports
- Efficient expenditure of Title III funds
- Meeting program objectives.

This evaluation will be used to support future funding allocations under the Title III Program.

*(*Annual Performance Reports that reflect the impact that the Title III activity has had on the entire operational aspect of the University are to be prepared and submitted to the Title III Administration by October 31st of each calendar year.)*

4.3 CAT-TRAC

Cat-Trac is Clark Atlanta University's Title III customized grant management system that is used for Title III Program Administration Activities ONLY. It is also used to assist Activity Directors in managing their grant activities. Cat-Trac is created from FileMaker Pro database software that is used to manage contacts, projects, assets or any collection of information that needs organizing over a network.

The Filemaker Pro software has been installed on all users' computers and is implemented by the Title III Office. It assists in maintaining up-to-date fiscal and programmatic records related to all aspects of all three Title III Grants. The electronic system is a stand-alone database that supports the Title III internal functions over a secured server. The system facilitates quality, timeliness and provides the program with accurate historical data that can be backed up electronically and stored for years.

Cat-Trac was designed to help Activity Directors manage their grant more effectively. Cat-Trac assists with grant administration and tracks Expenditures, Travel, Personnel, Budget Revisions, Site Visit Reports, Activity Operation Plans, Performance Reports and Inventory. Cat-Trac also allows the user to run Budget Checks. Cat-Trac connects activity objectives to each expense with each activity. It provides control mechanisms that allow the Title III Program Administration Office to

view data as it is entered into the software system. This permits the opportunity to ensure request are allowable and in compliance before erroneous documents are submitted. It allows technical assistance and feedback between Activity Directors and Program Specialists via emails and alert messages generated directly from the software system. It provides a programmatic and fiscal synopsis of all activities for each Title III grant year.

Approval in Cat-Trac indicates that it is **ONLY APPROVED TO PRINT!** All submissions must be approved in Cat-Trac before submitting to the Title III Program Administration Office. After printing, the Cat-Trac form along with ALL supporting documentation must be submitted to the Title III Program Administration Office for final approval.

4.4 DEPARTMENT OF EDUCATION REPORTING REQUIREMENTS

The Department of Education requires the University to maintain records that show the amount of funds awarded under each grant; how the spending of funds relates to the overall effectiveness of the institution; how the grant funds were used; the total scope of the project and other records to aid in facilitating an effective audit. The University must keep records that demonstrate compliance with program requirements and records that show significant project expenses and results. These records must be retained for three years after the final financial reports are submitted for the Activity for which the funds were granted.

4.4.1 Applications for Continued Funding Under Title III

Proposed activities, which are approved by University officials for continued funding under Title III, must submit an application during the Spring Semester of the year currently funded, which provides the following information:

- **An Activity Narrative:** The activity narrative for continuing activities will be composed of the parts that are described in the following paragraphs.
- **Activity Objectives for the Next Budget Period:** Objectives for the next year should be included and must be described in clear, concise measurable terms. These objectives must include the attainment measurement in quantitative terms.
- **An Evaluation Plan:** The evaluation plan must provide a detailed assessment of the implementation strategies and quantifiable evidence of the attainment of the objectives for each Activity for each grant year.
- **An Activity Budget:** All budgeted items are to be reflected in the format provided by the Department of Education, including major items such as Personnel, Fringe Benefits, Travel, Equipment, Contractual Services, Student Wages and others that allow the Activity to function as efficiently as intended.

Substantive changes in the scope and/or plan of operation of any Title III Activity must be approved by the Department of Education in writing prior to implementation. Requests for modification of any programmatic objective must be made through the Title III Director. If approved by the President, modifications will be included in our annual report submission to the Department of Education. Only after approval is received from the Department of Education can changes be effective. The Department of Education defines substantive changes to an institution's program as those changes which redirect the objectives and scope of an activity, changes in key

personnel, international travel, and continuation of the project for more than three months without the direction of a Project Director.

4.4.2 Performance Reports:

In order to provide systematic documentation of the achievement of objectives for each of the grant Activities, each Activity Director will complete a Performance Report. The report is to be placed on the forms provided by the Title III Program Administration Office. Performance Reports are due according to the schedule below:

- Report 1 – 1st Quarter (October 1st - December 31st) ----- January 15th
- Report 2 – Semi Annual (October 1st - March 31st) ----- April 15th
- Report 3 – 3rd Quarter (April 1st - June 30th) ----- July 15th
- Report 4 – Final (October 1st - September 30th) ----- October 15th

FAILURE TO SUBMIT PERFORMANCE REPORTS BY THE NOTED DUE DATES MAY RESULT IN AN ACTIVITY BEING TEMPORARILY SUSPENDED.

4.4.3 Annual Performance Report:

In addition to the Performance Report, each Activity Director will submit an Annual Performance Report (APR). This report, due no later than October 31st of each year, must provide the necessary information and data to compile the U.S. Department of Education's Annual Performance Report. Specifically, this report should include:

- An Introductory Statement regarding the Activity as it relates to the University at-large,
- A completion of relevant processes and outcome measures,
- A narrative summary of the status of Activity objectives.

In describing the status of activity objectives, consider the institutional impact of the Activity. In this section, analyze the overall impact of the activity to the institution by:

- Describing the positive impact(s) that the grant activities are having on other areas of the University and
- Describing any cooperative efforts with other units and staff of the University (non-Title III) and/or with other Title III Activities; thus, indicating the comprehensive impact on the institution. Further, include the expertise of non-grant personnel devoted to the project and the activity's institutional plan.

4.4.4 Time and Effort Reporting Requirements

The Department of Education requires the University to document and maintain Time and Effort Certifications on all federally supported employees. Internal procedures have been developed to ensure adherence to this requirement.

- Each Title III funded employee is required to complete a monthly Time and Effort form. Completed Time and Effort forms must be submitted monthly to the Title III Program Administration Office no later than the 5th business day following the reporting period.

- Each employee will need to sign a quarterly certification in the Office of Grants and Contracts when notified.
- Hourly employees must submit a monthly time and effort form, but attach all related time sheets.
- Copies of completed Time and Effort forms are to be maintained in the Activity Director's files and the Title III Program Administration Office.

NOTE: Activity Directors will be held accountable to ensure that personnel funded through Title III comply with this requirement. Failure to comply may result in an employee being discharged from the Title III grant.

5.0 EVALUATION

5.1 REPORTS OF PROGRESS

Both internal and external evaluations are management tools used to keep the program focused on annual objectives. Uniform Guidance, CFR 200 states that recipients shall monitor the performance of grant-supported activities and report progress according to program requirements. The evaluation should review programmatic progress to assure that positive efforts are being made toward achieving the goals of the grant.

5.1.1 Internal Evaluation

Internal audit evaluations will be carried out through quarterly monitoring reports, annual progress reports, and semi-annual Title III workshops. External evaluation is recommended annually. External evaluation will determine progress in achieving the objectives in its approved application, the effectiveness of the project in meeting the purposes of the program, and the effect of projects on the persons directly impacted by the projects.

5.1.2 External Evaluation

An independent external evaluator, at the discretion of the University President, will evaluate the Title III grant as well as the individual Title III Activities. The evaluator will conduct both a formative and a summative evaluation. Evaluators will look at all aspects of grant activities including a comparison of actual accomplishments to the goals established for the period, documentation of activity progress in meeting measurable objectives, allowability of project expenditures, and the effect of the project in strengthening the overall operation of the University.

6.0 OPERATIONAL AND FISCAL POLICIES

6.1 TITLE III FUNDED EMPLOYEES

This category includes all full-time, part-time, and temporary employees who are supported by Title III funds. Hiring procedures will follow University policy.

6.1.1 Personnel

In addition to University policy, Activity Directors are required to enter all personnel into Cat-Trac. Before initiating documents to hire new personnel, the Title III Program Administration Office must be consulted to ensure that the hiring of persons for Title III activities is within the framework of the approved Plan of Operation and to ensure that appropriate funds are available to accommodate the action. **Title III funds may not be used to supplant the use of University funds in the hiring process.** Individuals hired should clearly understand that they are being supported by Federal funds and that their employment is contingent on the receipt of those funds and the overall success of their Activity. All personnel must adhere to the Federal Regulations and Title III Program Administration Office Policy and Procedures.

6.1.2 Time Sheets

Time Sheets are required for hourly employees, temporary employees, student workers and stipend recipients. Time sheets will be processed in accordance with the University's related policy. Activity Directors are required to sign all time sheets. Timesheets are due to the University's Payroll Office (please see HR for a payroll schedule). Failure to submit time sheets by the due date may result in a delay in the employee being paid. **(A copy of all related time-sheets should accompany the monthly Time and Effort form when submitted to the Title III Program Administration office.)**

6.1.3 Fringe Benefits

Fringe benefits are available to persons supported by Title III funds, as allowed by University policy. **Title III does not fund the University's Tuition Remission Policy.**

6.1.4 Student Employment

Student Employment under Title III-funded Activities is an appropriate and beneficial use of resources. It is expected that student work assignments will be directly linked to an approved Title III Activity and that these assignments will be value-added experiences for the students. Activity Directors are also expected to budget and closely monitor the expenditure of student wages, as well as enter all student workers into Cat-Trac.

The Title III student hiring process will follow the University's policy. The decision to employ a particular student worker under Title III Programs rests solely with the Activity Director/Assistant and the Title III Director. The following conditions apply to all Title III student workers:

- A job description must be submitted to the Title III Program Administration Office before the student is hired.

- Student workers normally work during regular University operating hours unless otherwise approved.
- **STUDENT WORKERS WILL NOT BE PAID FOR WORKING ON OFFICIAL UNIVERSITY HOLIDAYS. IN NO CASE SHOULD A STUDENT BE PAID FOR HOURS NOT ACTUALLY WORKED.**
- Student work assignments should be related to the specific funded Activity or the day-to-day operation of the unit directly supporting the Activity.
- During the fall and spring semesters, students may work up to twenty (20) hours a week, however, some graduate student workers, because of the level of service they provide, may work up to thirty (30) hours a week. Such cases should be documented and approved by the Title III Director in advance. During the summer term, students may work up to 30 hours per week.
- Students must be enrolled as full-time students during the Fall and Spring semesters.
- **Students may not under any circumstances work in more than one Title III-funded position.**

Employment of Non-citizen Student Employees

Student workers who are non-citizens may be employed using Title III funds under the following conditions:

- Enrolled full-time in a degree-granting program at the University;
- Provide Visa documentation of their eligibility to work in this country; and
- Abide by any other regulations mandated by the University's Office of Human Resources.

6.2 CONSULTANT SERVICES

Consultants may be engaged to assist in fulfilling Activity Plan of Operation Objectives. A consultant may be used only as described in the Activity budget. The University's policy should be followed.

If the service provided was advice, the scope of this should be carefully documented with a written report from the consultant indicating his/her findings and a copy should be forwarded to the Title III Program Administration Office.

When a consultant is engaged to provide on-campus training (workshops, seminars, etc.), the following documents should be forwarded to the Title III Program Administration Office:

- 1) Documentation of Attendees
- 2) Agenda
- 3) Summary of Evaluations

ALL CONSULTANTS SHOULD HAVE PRIOR APPROVAL BEFORE WORK COMMENCES.

6.3 PROPERTY AND EQUIPMENT POLICY

Title III will adhere to University policies regarding Property and Equipment Policy (www.cau.edu/administration/propertycontrolpolicy). Title III Program Administration will reconcile with CAU Fiscal Office all equipment and property inventory records annually. Activity Directors are responsible to enter all equipment and property under their activity into Cat-Trac or maintain a record of the inventory.

6.3.1 Equipment

In addition, to University policy, purchases of equipment shall adhere to the following guidelines and governing directives.

The recipient shall use the equipment in the Activity for which it was acquired as long as needed, whether or not the Activity continues to be supported by Title III funding. When no longer needed for the original intent, the Activity Director or Coordinator will notify the Title III Administrators for appropriate disposition of the equipment.

After the time that the equipment is used in the Activity for which it was acquired; with the approval of the Title III Director and the Department of Education, the Activity Director may make it available for use on other “like projects or programs”. First preference for other use shall be given to other projects sponsored by the Department of Education; second preference shall be given to projects or programs sponsored by other Federal-awarding agencies.

University policy defines equipment as an item costing \$5,000 or more with a useful life of at least one year. Equipment that is made by two or more manufacturers and costs in excess of \$5,000 requires three official bids from prospective vendors. **All equipment must be encumbered before the end of the first quarter of each fund-year (before December 31st) unless justified and pre-approved by the Title III Director.**

6.3.2 Equipment Management Requirements (CFR §200.313 Equipment)

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

- 1) Property records shall be maintained accurately. Retention and access requirements for these records are explained in CFR 200.313(d) .

- (1) 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 (including the FAIN), who holds title, the acquisition date, and cost of the property, percentage of Federal participation in the project costs for the Federal 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.

- (2) A physical inventory of the property must be taken and the results reconciled with the property records at least once every two years.

(3) A control system must be developed to ensure adequate safeguards to prevent loss, damage, or theft of the property. Any loss, damage, or theft must be investigated.

(4) Adequate maintenance procedures must be developed to keep the property in good condition.

(5) If the non-Federal entity is authorized or required to sell the property, proper sales procedures must be established to ensure the highest possible return.

The Title III Property Control Specialist will make effort to inventory and tag all Title III equipment prior to it leaving Central Receiving. In the event the equipment is received by the activity, the Activity Director will contact the Property Control Specialist within 5 business days to schedule time to properly tag and inventory said equipment.

1. All equipment purchases that have a serial number and all purchases deemed “desirable” by Title III Program Administration must be tagged by the Property Control Specialist.
2. Adequate maintenance procedures shall be implemented to keep the equipment in good condition.
3. Where equipment is to be sold, the Federal Government has a right to part or all of the proceeds. Under no circumstances should equipment procured with Title III funds be sold without the written permission of the Title III Director.
4. All equipment associated with a previously funded, institutionalized Title III activity will continue to be inventoried and managed by the Property Control Specialist until the end of the 5 year cycle and/or extension year. At the end of the stated period, the equipment will be formally transferred to the University. Proper inventory and all applicable disposition records must continue to be maintained and made available to Title III Administration upon request.

All equipment in activities that are not institutionalized will be transferred to Title III Property Control to be made available for other Title III activities.

All users of CAU Title III provided equipment and desirable items (e.g. laptops, workstations and portable devices) are responsible for protecting such equipment from physical and environmental threats.

- Do not leave equipment or desirable items in an unattended vehicle or any public place.
- Do not use or leave equipment or desirable items where there is risk of physical damage (e.g. water, heat, dropping, falling, etc.) or theft.
- Do not loan equipment or desirable items to any other person, (i.e. CAU faculty, staff and students and non-CAU persons) without prior approval from the Title III Property Control Specialist.

New Equipment

Once a new requisition for equipment that requires a Title III tag is approved by the Title III Administration, the Activity Director will receive an email from their Program Specialist. The email will provide a listing of the items that require tagging.

New Title III equipment that is processed through Central Receiving must be tagged by the Property Control Specialist and Central Receiving (if applicable) prior to it being released to the Title III activity.

It is the Activity Director's responsibility to notify the Property Control Specialist of all equipment that is delivered directly to the Title III activity (i.e. furniture, computers and other large bulk items) and not processed through Central Receiving. All items must be tagged by Title III.

The Program Specialist must be notified of any changes to the delivery procedures of all new Title III equipment.

Unused Equipment

- All Title III provided equipment that is not currently in use by CAU faculty, staff or students must be turned over to the Property Control Specialist to be stored in the Title III Property Control room located in the Thomas Cole Science Research Center, Room B014. This includes computers, laptops, tablets and other items purchased with Title III funds.
- These items will be stored by activity and can be checked out on a need basis. The activity in which the equipment originated will have priority in its use.
- All requests for equipment and desirable items must be initiated by the Activity Director via an email and a completed equipment checkout form.
- Equipment that an activity no longer needs and is in good working condition can be transferred over to Title III Property Control by completing a transfer form.
- All equipment recalls and transfers must be scheduled by the Title III Property Control Specialist. No equipment will be received without being previously scheduled.

Equipment Checkout Procedures

For Groups:

Staff and Faculty seeking to check out equipment and desirable items for groups must submit a request to the Title III Property Control Specialist.

For Individuals:

Faculty, staff, and students can check out equipment and desirable items on an individual basis from the Title III Property Control Specialist for up to one academic semester and are bound by the same policies including reservation limits, lateness, loss, damage, and theft.

- Users are responsible for checking equipment and desirable items for damages and missing parts before checking out equipment.
- Faculty, staff, and students can return equipment and desirable items to the Title III Equipment office located in the Thomas Cole Science and Research Center, Room B014 during normal business hours.

Lateness

All equipment and desirable items must be returned by the return date according to the approved request. If the equipment and desirable items are not returned as required then the following sanctions may be applied:

- Student Accounts will be placed on HOLD.
- Faculty and staff may be subject to loss of equipment loan privileges.

NOTE: Users may be subject to payroll deduction for the cost of the equipment and desirable items if not returned within 5 business days.

Activity Directors are responsible for the retrieval of all equipment and desirable items not returned within 5 business days.

Damage

Users are responsible for the following:

- Accidental damage resulting from misuse or improper use of the equipment and desirable items
- Damage done to the equipment and desirable items by other people
- Intentional damage caused by negligence, misuse, abuse, or carelessness

Users are not responsible for the following:

- Equipment or electronic device failures due to typical wear and use

Problems with equipment and desirable items should be reported immediately to the Title III Property Control Specialist.

Users who damage equipment and desirable items that are less than \$5,000 may lose their checkout privileges for an amount of time to be determined by the Title III Property Control Specialist, based on the circumstances of each case, and the history of the user's equipment use.

Per Department of Education policy, users or departments who damage equipment valued at \$5,000 or more are responsible for replacement of equipment.

Loss and Theft

Users are responsible for lost equipment and desirable items. Users will be given a reasonable amount of time to locate missing parts. Users will lose their checkout privileges until they locate or replace missing and lost equipment and desirable items (including parts).

If equipment and desirable items are stolen, users must contact police and supply the Title III Program Administration office with a case number within 48 hours. The user will have two weeks to submit an official copy of the Police Report to the Title III Program Administration office.

Users who lose or have equipment and desirable items stolen that are valued at less than \$5,000 may lose their checkout privileges for an amount of time to be determined by the Title III Property Control Specialist, based on the circumstances of each case, and the history of the user's equipment/desirable item use.

Per Department of Education policy, users or departments who lose or have equipment and desirable items stolen valued at \$5,000 or more are responsible for replacement of equipment.

Disposing/Transferring Equipment

The Title III Property Control Specialist must be contacted before transferring or disposing Title III equipment, furniture and desirable items. The Activity Director will complete the asset disposal/transfer form. The Title III Property Control Specialist will work with the Disposal Analyst to review and process the submitted documentation and physical inventory the items being disposed/transferred. Once all items are properly inventoried, the Property Control Specialist will obtain the Title III Executive Director's approval. Once the approved, the Title III Property Control Specialist will:

- Forward the disposal form to the Disposal Analyst in General Accounting
- Contact the Activity Director with instructions for disposing/transferring equipment

The Property Control Specialist will record equipment and desirable items transfer information, including physical location changes and department transfers in the Title III inventory database

Tracking Inventory

The Property Control Specialist works with each Activity Directory to complete a comprehensive inventory of all Title III property, during the summer semester and compares all items with Title III Administration's records. Discrepancies are traced and reconciled.

- Periodically, a physical inventory of all Title III physical property will be taken.
- Inventories will be conducted by buildings, location or other University subdivisions, and will be conducted throughout the year.
- Users with existing checked out items, must make the equipment available to the Property Control Specialist at least once each semester to be assessed and inventoried.
- The list of items not located during the inventory will be forwarded to the Activity Director responsible for the missing property within 5 working days of the completion of the physical inventory.
- The Activity Director must make another attempt to account for the missing property.
- Results of this search are to be provided to the Property Control Specialist within 5 working days.
- The Property Control Specialist will update the Title III inventory database to accurately reflect the status of items that had been missing.
- The Property Control Specialist will notify the Title III Administration Director of any Activity Director who fails to respond to a request for an accounting of missing property items within the given time period.

Equipment Disposition CFR 200.313(e) When original or replacement equipment acquired under a Federal award is no longer needed for the original project or program or for other activities currently or previously supported by a Federal awarding agency, except as otherwise provided in Federal statutes, regulations, or Federal awarding agency disposition instructions, the non-Federal entity must request disposition instructions from the Federal awarding agency if required by the terms and conditions of the Federal award. Disposition of the equipment will be made as follows, in accordance with Federal awarding agency disposition instructions:

(1) Items of equipment with a current per unit fair market value of \$5,000 or less may be retained, sold or otherwise disposed of with no further obligation to the Federal awarding agency.

(2) Except as provided in §200.312 Federally-owned and exempt property, paragraph (b), or if the Federal awarding agency fails to provide requested disposition instructions within 120 days, items of equipment with a current per-unit fair-market value in excess of \$5,000 may be retained by the non-Federal entity or sold. The Federal awarding agency is entitled to an amount calculated by multiplying the current market value or proceeds from sale by the Federal awarding agency's percentage of participation in the cost of the original purchase. If the equipment is sold, the Federal awarding agency may permit the non-Federal entity to deduct and retain from the Federal share \$500 or ten percent of the proceeds, whichever is less, for its selling and handling expenses.

(3) The non-Federal entity may transfer title to the property to the Federal Government or to an eligible third party provided that, in such cases, the non-Federal entity must be entitled to compensation for its attributable percentage of the current fair market value of the property.

(4) In cases where a non-Federal entity fails to take appropriate disposition actions, the Federal awarding agency may direct the non-Federal entity to take disposition actions.

Equipment is approved for use in the achievement of objectives of each Activity and should be moved only if the Activity is being moved to different quarters at the University, or the equipment is required for use in another department attached to the University. Title III Administration must be notified prior to the relocation of any equipment or furniture items and approved by the Title III Director.

6.4 RECORDS MANAGEMENT POLICY

Title III Program Administration Office, Office of Grants and Contract Accounting, and Activity Directors will maintain records of budgetary expenditures for Title III Activities. Activity Directors should also maintain files for all Title III related documentation; Time and Efforts, Performance Reports, Semi-Annual Reports, Annual Reports and any other documentation as a result of a Title III funded project. This record keeping will provide up-to-date information relative to the availability of funds and make sure that accurate records are available for site visits, evaluations and audits.

6.4.1 Record Retention Requirement

CFR 200.33 Retention requirements for records.

(b) Financial records, supporting documents, statistical records, and all other records pertinent to an award shall be retained for a period of three years from the date of submission of the final expenditure report or, for awards that are renewed quarterly or annually, from the date of the submission of the quarterly or annual financial report, as authorized by the Secretary. The only exceptions are the following:

(a) If any litigation, claim, or audit is started before the expiration of the 3-year period, the records must be retained until all litigation, claims, or audit findings involving the records have been resolved and final action taken.

(b) When the non-Federal entity is notified in writing by the Federal awarding agency, cognizant agency for audit, oversight agency for audit, cognizant agency for indirect costs, or pass-through entity to extend the retention period.

(c) Records for real property and equipment acquired with Federal funds must be retained for 3 years after final disposition.

(d) When records are transferred to or maintained by the Federal awarding agency or pass-through entity, the 3-year retention requirement is not applicable to the non-Federal entity.

(e) Records for program income transactions after the period of performance. In some cases recipients must report program income after the period of performance. Where there is such a requirement, the retention period for the records pertaining to the earning of the program income starts from the end of the non-Federal entity's fiscal year in which the program income is earned.

(f) Indirect cost rate proposals and cost allocations plans.

6.4.2 Record Retention Procedures

Memorandums, Letters, etc. – Correspondence received from Activity Directors, the University campus, Department Of Education and other entities, that pertains to Title III Activities, will remain in the Title III office for duration of five years. The Title III Director will be responsible for determining any exceptions.

Requisitions and Travel Documents – These documents will remain in the Title III office for duration of five years.

Personnel documents for Activities – These documents will remain in the Title III office for duration of five years.

Time and Efforts Forms – These documents will remain in the Title III office for duration of five years.

Comprehensive Development and Phase II Plans – These documents will remain in the office for duration of the five (5) year cycle. After the five (5) year cycle, the documents will be archived electronically for an additional five (5) years.

Grant Award Notifications – These documents will be stored electronically and archived indefinitely.

6.4.3 Record Disposal Procedure

The Office Manager is responsible for maintaining and disposing all general office records. Other Title III staff can only dispose of secondary files. With exception of pre-determined records, the Office Manager identifies and makes recommendations to the Title III Director for approval of all proposed records to be disposed. Once approved records will be destroyed by shredding based upon the Record Retention Procedure.

6.5 PROCUREMENT POLICIES AND PROCEDURES

All requests for supplies, equipment, services, rentals, subscriptions or any other transactions that involve an expenditure of Title III funds must be entered into Cat-Trac.

Requisition for goods with an individual cost of \$5,000 or more and services of \$10,000 or more must be accompanied by three (3) quotes. Each quote must be provided by a different vendor. Requisitions for services in amount exceeding the small purchase threshold (in accordance with 41 U.S.C. 1908 – currently \$150,000) must proceed through the University's Request for Proposal (RFP) process.

In addition to entering these transactions into Cat-Trac, Title III will adhere to the University Policy regarding purchasing. (<http://www.cau.edu/compliance-office/includes/files/7-8-1-purchasing-operating-procedures.pdf>)

In addition to University Policy and in accordance with the Uniform Guidance Part 200, recipients of Federal awards, such as Title III, 1 must take all necessary affirmative steps to assure that minority businesses, women's business enterprises, and labor surplus area firms are used when possible. Affirmative steps include:

- (1) Placing qualified small and minority businesses and women's business enterprises on solicitation lists;
- (2) Assuring that small and minority businesses, and women's business enterprises are solicited whenever they are potential sources;

(3) Dividing total requirements, when economically feasible, into smaller tasks or quantities to permit maximum participation by small and minority businesses, and women's business enterprises;

(4) Establishing delivery schedules, where the requirement permits, which encourage participation by small and minority businesses, and women's business enterprises;

(5) Using the services and assistance, as appropriate, of such organizations as the Small Business Administration and the Minority Business Development Agency of the Department of Commerce;

In all cases, the procurement process must be in conformance with Uniform Guidance Sections:

§200.318 General procurement standards

§200.319 Competition

§200.320 Methods of procurement to be followed

§200.321 Contracting with small and minority businesses, women's business enterprises, and labor surplus area firms

§200.323 Contract cost and price

Under no circumstances will any Title III representative engage in any formal contact or other commitment with outside vendors without prior approval and adherence to the appropriate process of required requisition documentation.

6.5.1 SOLE SOURCE PROCUREMENT

Sole Source Procurement must be presented and approved through the Department of Education. Sole Source Procurement occurs when only one vendor is known to supply a particular item requested for purchase. This method of purchasing involves no competition and should be avoided as much as possible. If used, the sole source procurement should be justified and well documented. Evidence of such documentation should be retained for record-keeping purposes.

Final responsibility in determining whether an item is a proprietary item and should be purchased from a sole source is determined by the Purchasing Department, and approved by the Title III Director for compliance.

The University Single/Sole Source Justification can be found at <http://www.cau.edu/CMFiles/Docs/SingleSoleSource.pdf>

6.5.2 DEBARMENT AND SUSPENSION

Federal awarding agencies and recipients shall comply with the non-procurement debarment and suspension common rule implementing E.O.s 12549 and 12689, "Debarment and Suspension." This common rule restricts sub-awards and contracts with certain parties that are debarred, suspended or otherwise excluded from or ineligible for participation in Federal assistance programs or activities.

6.6 CARRY-FORWARD PROCEDURE

Carry-forward funds, formerly known as 'spend down' accounts, are funds which are leftover from previous years. The purpose of this policy is to develop a uniform procedure in which carry-forward funds are requested and distributed.

- Near the end of each funding year, the Title III Director will determine the budget balance for all activities.
 - There must be minimal encumbrances (less than \$500) with an explanation that is approved by Title III Director before funds can be allocated to a carry-forward activity. These encumbrances should not include travel.
- The Title III Director will meet with the President before the beginning of the new grant year to discuss the budget balance, input and approval for the projects to be implemented during the next grant year. Funds will be spent on objectives which were not completed in the prior grant year.
- Carry forward funds cannot be expended beyond the current five (5) year cycle unless an extension from the US Department of Education is granted. If there is a need for deviation, a proposal should be prepared, submitted to the Title III Director who in turn will submit it to the U.S. Department of Education in Washington for review and approval by the Program Officer.
- Activity Directors who receive approval to receive carry-forward funds will prepare a complete activity proposal to be submitted to Title III for approval by the Title III Director and the Program Specialists by the end of August. The same procedure and template used for creating new activities and writing measurable objectives should be used in this carry-forward process.
- The Title III Director will prepare the necessary Budget Revision and Form 405 to submit to Grants & Contracts to set up the Carry-forward accounts.
- Grants & Contracts will release the remaining funds in Banner from the current activities and carry the funds over to a new account with a new fund/index number no later than October 15th of the new grant year.
- Grants & Contracts will contact the Title III Director and Office Manager by email when the new accounts have been created in Banner.
- Program Specialists will contact the Activity Director(s) with the new account information.

6.7 TRAVEL POLICY

All Title III funded Travel will adhere to University Travel Policy. (http://www.cau.edu/compliance-office/_includes/files/7-5-4-travel-policy-06-24-2015.pdf). All travel must be entered into Cat-Trac along with the submission of a Travel Justification form. All travel on Title III funds must facilitate the achievement of a planned Activity objective. All travel expenses must be approved by the Title III Director before traveling. *No travel expenses will be reimbursed for unapproved travel.*

6.8 BUDGET

Periodic budget analysis should also be conducted by the Activity Directors to ensure that Title III funds are being spent in a timely and efficient manner. Annual funds should be utilized to ensure that the objectives of the Activity are accomplished. Any deviations or discrepancies are to be explained in the Performance Reports.

Activity budgets must be related to the approved program Plan of Operation and consistent with the intent of the Department of Education in carrying out the objectives of Title III Programs.

6.8.1 Budget Revisions

All Title III Budget Revisions will adhere to University Policy regarding fiscal modifications. The Title III Program Administration Office requires additional programmatic information that must be entered into Cat-Trac. They are as follows:

- The request must be approved for submittal purposes in Cat-Trac before completing the University Budget Revision form.
- Once the request is approved in Cat-trac, a University Budget Revision form must be completed and submitted to the Title III Administration Program Office for processing and approval.
- Once approved by the Title III Director, the Budget Revision form will be forwarded to the Office of Grants and Contracts.

Budget Revisions will only be considered during January of each grant year. Activity Directors are expected to carefully monitor their accounts monthly to ensure that fiscal resources are accurate and adequately expensed.

6.9 STUDENT FINANCIAL ASSISTANCE

6.9.1 Title III Policy for Graduate Student Stipend Support and Tuition Waivers

A cornerstone in the education of graduate students in science, technology, engineering and mathematics (STEM) throughout the U.S. has been the provision of assistantship support in combination with classroom and laboratory teaching. At Clark Atlanta University, the granting of assistantships for the entire period of STEM area training for the Ph.D. degree has been defined as a Research Assistantship and / or a Teaching Assistantship. Due to the rigorous nature of the programs, STEM graduate students are strongly encouraged to not seek employment that would impede degree completion. The purpose of the assistantships are to provide the graduate programs in the STEM areas an opportunity to increase the number of African American students entering and most importantly completing doctoral degree programs by defraying expenses incurred during matriculation at CAU.

ALLOWABLE

Higher Education Act of 1965, Part B, Sec. 326.
Professional or Graduate Institutions

c) **USES OF FUNDS.** — A grant under this section may be used for—

(4) scholarships, fellowships, and other financial assistance for needy graduate and professional students to permit the enrollment of the students in and completion of the doctoral degree in medicine, dentistry, pharmacy, veterinary medicine, law, and the doctorate degree in the physical or natural sciences, engineering, mathematics, or other scientific disciplines in which African-Americans are underrepresented.

ELIGIBILITY

1. **Enrollment** – Students must be fully admitted into a STEM doctoral program and enrolled in at least 6 or more hours during the fall and spring semesters at the end of the add/drop period each term, except for Graduate Students who are in the dissertation phase of their doctoral program. Title III will fund the maximum of 9 hours including fees for the fall and spring semester. ***Students must be registered in order for Title III funds to reflect on their account.***
2. **3.0 GPA** – Students receiving financial support will maintain a 3.0 cumulative grade point average throughout the duration of the financial support period.
3. **Citizenship** – Students must be a United States Citizen and be of African American decent.
4. **Financial Need** – A student Expected Family Contribution (EFC) has to less than or equal to \$10,000.00
5. **Teaching and Research Assistants** – Teaching Assistants and Research Assistants are selected based on the recommendation of their department. Services, duties and responsibilities performed by Teaching and Research Assistants must be related to the student's academic program in order to qualify for the assistantship program.
6. ***Students cannot receive additional financial support from other federally funded grants!***

SELECTION PROCESS - (use as checklist)

- 1) Appropriate Department Chairs select students based on their GPA, progress in the program, research progress, faculty evaluations, and available funds.
- 2) Students must disclose in writing how their tuition and fees will be paid per semester; i.e. waiver, scholarship, Title III stipend, student loan, etc. This information must be verified by the Department Chairs and the Activity Director and submitted to the Title III office.
- 3) Activity Director/Activity Coordinator must attach supporting documentation to include: Student Statement of Need, Student Aid Report (SAR) from FAFSA.ed.gov, Transcript and the description of the Assistantship selected.
- 4) In order to avoid processing delays, students are strongly encouraged to register for classes during the pre-registration phase. Department chairs must stress the necessity of registering on time to the students.
- 5) Failure to register for classes in a timely manner will result in delayed compensation.
- 6) Activity Director/ Activity Coordinator must first enter request(s) in CAT-TRAC (Title III's grant managing system).

- 7) If a tuition waiver is needed, the Activity Director must complete a CAU Title III Tuition Waiver Summary Form and submit it to the Title III office (Stipend eligibility applies, however an assistantship is not required for a tuition waiver).
- 8) Activity Director must submit completed CAU Student Stipend Payment Forms via EPAF for approval.
- 9) The Title III office will review all paperwork. Once the approval of the Title III Director is obtained, the paperwork will be forwarded to the office of Grants & Contracts for processing.
- 10) All recipients will turn in a time sheet along with the time and effort report in a timely manner each month. All reports are due to the Title III office the 5th business day of each month. Recipients will be funded a maximum of 35 hours a week at an hourly wage. You will get paid ____ per hour. Failure to comply may impact the distribution of funds.
- 11) Copies of your application package will be on file in the following departments: Graduate Studies, Title III and appropriate departments.

The student financial support policy will be reviewed at the beginning of every new Title III grant cycle. The student stipend policy will be reviewed at the beginning of every new Title III grant cycle.

6.9.2 Graduate Research Assistant ***Department of Biological Sciences***

The research assistant conducts in laboratory investigations concerned with a specific research problem. In conducting this research, specific tasks include but are not limited to: developing and implementing research methods related to the selected research problem; maintaining assigned laboratory space; applying safe laboratory practices when conducting in laboratory activities; developing and presenting a research prospectus; reporting data to the laboratory lead scientists; conducting regular meeting with established advisory committee and preparing research data for publication. The research assistant will also provide required reports to the program director they are employed with. The graduate research assistant must be enrolled in a graduate school program.

6.9.3 Department of Chemistry ***School of Arts and Sciences***

Reports To: Instructor of Record/Advisor/Department Chair

General Function (Description):

Graduate Student Teaching Assistants (GSTA) is full critical partners in the teaching and administration of General Chemistry, Organic Chemistry and other labs as assigned. GSTAs work with the primary course instructors and faculty to help CAU students obtain a solid foundation in general and organic chemistry through hands-on activities and mentorship and in the laboratory course study. GSTAs attend a weekly meeting with the course instructor for one (1) hour maximum. Specific duties and responsibilities of a

GSTA cover assignments and/or instruction given by the instructor/advisor or department chair

7.0 COMPETITIVE GRANT

7.1 SUBMISSION PROCESS

Clark Atlanta University has three Title III Programs: HBCU, HBGI and SAFRA. Title III provides funding to project activities derived from Clark Atlanta University's Strategic Plan which is designed to help meet various strategic goals of the University. Title III of the Higher Education Act of 1965, as amended, authorizes these grants to strengthen institutions in the following areas: ***Academic Quality, Fiscal Stability, Student Services and outcomes, and the quality of Institutional Management.***

The Title III Program Activities are to carry out the programmatic objectives of the strategic plan through the Title III Comprehensive Development Plan (CDP). The Comprehensive Development Plan enables the University to determine benchmark data, determine measurable outcomes, and document how the Title III, Part B-Strengthening Historically Black Colleges and Universities and the Historically Black Graduate Institutions grants have strengthened the institution. All proposals and selected activities must support and be aligned with one of the University's Strategic Priorities.

The Title III Program Administration monitors and assesses outcomes based on analytical and empirical approaches and revises those desired outcomes as institutional needs change. When the CDP is being prepared for submission to the Department of Education, the university solicits proposals from the general college community for competitive consideration. This is a new approach in Clark Atlanta University Title III history, and will be conducted as set out in the "**Title III Grant Competition Manual.**"

Applicants must first submit a pre-proposal abstract to the **Competitive Grant Selection Committee** for consideration which should include statements regarding; a definition of the problem (need), a description of the present condition (quantitative baseline data), a brief strategy to the solution to the problem and the resulting impact that is expected after the intervention.

Selected abstracts will be invited to submit a full application, and will be asked to follow specific guidelines and requirements. The application should include Project Objectives and Performance Indicators, Implementation Strategies, a Comprehensive Budget and a realistic and detailed plan to "Institutionalize" the project at its end.

Selection and Awarding Process

1. Applications are screened against the eligibility criteria; and eligible applicants are evaluated, scored and ranked.
2. The Competitive Selection Committee conducts intense discussions and evaluations of the merits of each individual proposal.
3. After thorough evaluation and prioritization, the Competitive Selection Committee makes its recommendations to the University President and Title III Director for the actual funding decision and inclusion into the Comprehensive Development Plan (CDP).

Note: The President may include at his will, any cornerstone activity that he considers central to the plan, and will not be included in the competition.