

The Office of Sponsored Programs, Contracts and Grants supports Elizabeth City State University's (ECSU) research mission by assisting faculty and staff in the procurement of grants, contracts and cooperative agreements from external sponsors

Office of Sponsored Programs

Title III Procedure Manual

Title III is a federal grant awarded to ECSU by the U.S. Department of Education. The Title III grant is administered by ECSU's Office of Sponsored Programs.

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Title III Proposal Development Procedure

Preamble

ECSU Title III Project Administration staff, consisting of the Title III Coordinator and support staff, shall ensure that the University follows all U.S. Department of Education guidelines for the development and submission of its annual and 5-year cycle proposals for funding under Title III, Part B, Strengthening Historically Black Colleges and Universities Program.

1. Comprehensive Development Plan

Title III applications are approved for a 5-year project cycle, although budget information is submitted and awards are made annually. ECSU Project Administration staff shall develop and maintain a Comprehensive Development Plan (CDP), which provides strategic direction and institutional priorities for use of Title III funds during each 5-year funding cycle.

2. Phase 1 Data Collection

The U. S. Department of Education uses a formula to determine the Title III annual grant award levels for each participating institution. This formula is based on three criteria: (i) The number of recent graduates from the institution, (ii) the number of students receiving Pell Grants (need based financial assistance), and (iii) the number of recent ECSU graduates who enroll in graduate school. Collectively, these inputs are called “Phase 1 Data”. Title III Project Administration Staff shall:

- a. compile and verify the required Phase 1 Data Report
- b. forward the Phase 1 Data report to the ECSU Chancellor for signature
- c. submit the certified Phase 1 Data Report to the Department of Education.

3. Proposal Submission Process

Once the Phase 1 Data is submitted, the U. S. Department of Education shall submit a Title III grant award letter to ECSU including the amount of the annual award, and a submission date for the final proposal (generally within 30 days after receipt of the award letter). Project Administration Staff shall:

- a. work cooperatively with the ECSU administration in order to oversee an institution-wide Title III Request For Proposal (RFP) procedure;
- b. ensure that the final Title III proposal, once approved by the Chancellor, is submitted to the U.S. Department of Education.

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Title III Program Reporting Procedure

Preamble

All institutions receiving Title III grants are responsible for monitoring and reporting program performance to the Department of Education, per guidelines contained in the Education Department General Administrative Regulations (EDGAR). ECSU Project Administration staff shall ensure that all project personnel accurately complete and submit required reports in a timely manner.

1. Quarterly Progress Report

Each ECSU Title III Activity Director shall submit a quarterly progress report electronically to the Title III Coordinator not later than 10 working days after the end of each quarter. A standardized form, downloadable from the ECSU website, shall be used, ensuring that metrics are provided to document program achievements during the reporting period. Activity Directors must report on agency approved objectives for the current period. Any changes in objectives must have prior approval by the funding agency. Activity Directors shall provide proof of documentation related to objective status as requested.

2. Annual Performance Report

The Department of Education requires that each Title III recipient institution submit an annual performance report no later than 90 days after the end of the fiscal year. ECSU Project Administration staff, in collaboration with activity staff, shall complete this report, in accordance with guidelines contained in the Education Department General Administrative Regulations (EDGAR).

3. 5-Year Performance Report

At the end of a 5-year Title III grant cycle, the U.S. Department of Education may require a summative report of progress attained by the institution through utilization of Title III funds. ECSU Title III Project Administration staff shall complete this report, in accordance with guidelines contained in the Education Department General Administrative Regulations (EDGAR).

4. Time and Effort Report

All full-time ECSU employees (both faculty and staff) who are paid from Title III grant funds shall complete and submit a Time & Effort Report at the end of each semester and summer, to document their project hours worked. The Time and Effort report shall be signed by either the employee or supervisor, and the signed hardcopy shall be submitted to the Title III Project office not later than 10th day following semester/summer end. The Time and Effort reports shall be compiled and disseminated by the Contracts and Grants office.

5. Trip Report

All ECSU employees (both faculty and staff) who have received prior approval to travel using Title III grant funds shall complete and submit a Trip Report upon returning to campus, in order to document the trip's relevance to program objectives. The Trip Report form, downloadable from the ECSU website, shall be completed and signed by the traveler and presented to the Title III Activity Director along with the request for travel reimbursement.

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Title III Program Evaluation Procedure

Preamble

Department of Education guidelines require that all Title III conduct regular, on-going program evaluations of all funded activities, as a means of ensuring the effectiveness of each program in achieving its stated objectives. ECSU Project Administration staff shall utilize both internal and external program evaluations in order to maximize overall effectiveness of all funded Title III activities.

1. Internal Evaluation

- The Title III Coordinator shall conduct regular review of each Title III funded activity during the project year in order to meet with Activity Directors and staff, audit required administrative files, and provide general management oversight.
- These meetings shall be documented via signed Title III Internal Site Visit forms; copies shall be maintained on-file by both the Activity Director and the Project Administration office.

2. External Evaluation

- Project Administration staff shall schedule a summative external evaluation at least every 2 years according to the U.S. Department of Education (EDGAR) regulations, by an experienced consultant team, in order to obtain an objective performance assessment of each Title III funded activity. The evaluation team shall review each activity's quarter performance reports and interview project personnel from each activity, and assess the activity's performance in terms of its stated objectives, as well as its impact on the institution. The results shall be documented in a formal, written evaluation report, submitted to Project Administration staff within 30 days of the conclusion of the evaluation. Upon receipt of the final report, the Title III Coordinator shall review evaluation ratings and recommendations with each Activity Director, and document this discussion using the Title III Internal Site Visit Form.

Title III Program Expenditures Procedure

Preamble

ECSU Project Administration staff shall ensure that all Title III project expenditures are compliant with federal statutes contained in the Office of Management and Budget (OMB) 2CFR 200 of the Uniform Guidance: Cost Principals for Educational Institutions, and the Education Department General Administrative Regulations (EDGAR). These documents define the parameters for allowable costs using federal grant funds. Procedurally, local ECSU administrative policies shall be followed for all program expenditures, with a few additional Title III-specific procedures, as noted below:

1. Procurement Requests

Items purchased using Title III funds shall be indicated in the detailed budget narrative of each Title III activity, and shall be directly related to the stated program objectives of the activity (as documented in the original proposal). The ECSU procurement system shall be used for all expenditure requests, and shall be approved by the Activity Director, the Title III Office and other appropriate approvers. Once approved by the Title III Coordinator, the requisitions shall be forwarded to the Office of Business and Finance for final processing.

2. Budget Justification Memos

For procurement of any item(s) not indicated in the detailed budget, the Activity Director shall submit a budget justification memo to the Title III Coordinator, detailing the cost and how the requested item(s) are relevant to the program objectives. The signed budget justification memo should be submitted with the procurement request.

3. Budget Transfer Form

If sufficient funds are not available in the line item (e.g. Supplies) of the project budget for the required purchase, the Activity Director shall complete a Title III Budget Transfer Form, which is available in the ECSU procurement system on ECSU's website.

On this form, the Activity Director shall justify the need for the request and document which line items the necessary funds will be transferred from. The Budget Transfer Form should be submitted in the procurement system for Title III Office approval.

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Title III Program Travel Procedure

Preamble

Title III Project Administration staff shall ensure that all project personnel follow applicable federal guidelines for travel, as documented in the Office of Management and Budget (OMB) 2CFR 200 of the Uniform Guidance: Cost Principals for Educational Institutions, as well as any institutional travel policies. Additionally, there are some Title III-specific guidelines that shall be followed by all project personnel, as dictated by the Department of Education Title III Program Office, known as the Institutional Development and Undergraduate Education Service (IDUES).

1. Travel Authorization

All travel using Title III funds shall be pre-approved by the Title III Coordinator before the trip is taken, as evidenced by an ECSU Travel Authorization form in the University procurement system. The Title III Coordinator shall only approve the travel if the following conditions are met:

- a. The requested travel is relevant to the objectives of the Title III activity; funds are allocated in the current budget
- b. The ECSU travel request is completed prior to the employee's departure (indicating budget code, dates of travel, etc.). Other required approvals (employee, supervisor, and department or division head) shall be obtained prior to travel.

2. Student Travel

In strict accordance with IDUES guidelines, Title III funds shall not be used for student travel. Only activity related faculty and staff shall travel using Title III funds.

3. International Travel

Currently, Title III funds do not support international travel.

Title III Program Endowment Management Procedure

Preamble

ECSU Title III Project Administration staff, working collaboratively with the ECSU Foundation and the ECSU Office of Business and Finance, shall ensure that project personnel follow all applicable federal guidelines for oversight of the Title III endowment funds, as dictated by the Department of Education Title III Program Office, known as Institutional Service (IS). The Title III Endowment Management Policy shall document the internal control mechanisms necessary to ensure the University maintains proper stewardship and oversight of these funds.

1. Raising the local endowment funds

The ECSU Foundation, under the administrative oversight of the Vice Chancellor of the Division of Institutional Advancement, shall be responsible for all development activities necessary to meet endowment fundraising goals, as specified in the approved ECSU Title III Plan of Operation (also referred to as the Title III proposal). Title III guidelines permit institutions to use up to a maximum of 20% of their grant funds for endowment building.

The project period for raising these funds is the federal government fiscal year (beginning annually on October 1st and extending through the following September 30th). The following are **unallowable** sources of matching for the Title III endowment:

- Pledge of funds or securities
- Deferred gifts
- Borrowed funds
- Corpus or income of an endowment fund or quasi-endowment fund

2. Drawdown of matching federal funds

Federal matching funds for the endowment activity cannot be drawn down until all the required local dollars have been raised. Once the ECSU foundation has raised sufficient funds to meet the federal match, as specified in the Title III Plan of Operation, a request for a special account to be set up in the ECSU Office of Business & Finance. Once the locally raised funds have been transferred to this University account, the Office of Business & Finance shall then draw down the matching Title III federal funds using the U. S. Department of Education Grant Administration & Payment System (G-5).

3. Investment of Endowment Corpus

Responsibility for investment of the endowment corpus shall reside with the Vice Chancellor of Business & Finance, who will make recommendations to the Executive Committee of the ECSU Foundation Board. Endowment funds should be continually monitored by the office of Business

& Finance, in an effort to optimize return on investment (ROI) with minimal risk. Endowment investments should be invested in low-risk securities, exercising judgment and care, and abiding by all applicable state and federal guidelines. The University shall not invest these funds in real estate. Refer to the U.S. Code of Federal Regulations (CFR 628.43) for more details of Title III endowment investment restrictions.

4. Reporting Requirements

Per grant guidelines, all ECSU Title III activities are required to submit quarterly progress reports and annual performance summary reports to the Title III Coordinator. In the quarterly progress reports, the Activity Director (Vice Chancellor of Institutional Advancement) shall report on all fundraising activities associated with the endowment, as well as a financial statement showing the status of the investment earnings.

Additionally, the Activity Director shall maintain strict records of:

- Source, kind, and amount of matching funds
- Documentation of the actual funds transfer for the Title III funds as well as the matching funds
- Type and amount of investments
- Amount of endowment fund income
- Amount and purpose of expenditures of endowment fund income

5. Access to Interest Earned on Endowment

During the 20-year investment cycle of the endowment, the corpus (principal) cannot be accessed by the University. Only 50% of the interest earned in the endowment account shall be accessible to the University, to meet its operating costs. The ECSU Vice Chancellor of Business & Finance shall ensure that 50% of the interest from the endowment is moved to a special University account once each fiscal year, leaving the remaining corpus intact. To withdraw the interest from the interest-bearing endowment account and make this annual fund transfer, signatures shall be required from each of the following three offices: (1) Institutional Advancement, (2) Business & Finance, and (3) Sponsored Programs.

The dispensation of the earned interest shall be determined at the discretion of the ECSU Chancellor.

6. Maturation of Endowment Funds

The corpus of the endowment funds cannot be accessed for 20 years, until the endowment matures. At the end of this period, the Title III funds and the matching funds in the account become fully available to the University for any educational purposes.

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Title III Activity Management Procedure

Preamble

ECSU Title III Project Administration staff, consisting of the Title III Coordinator and administrative support, shall ensure that the University follows all U. S. Department of Education guidelines for the management of approved activities funded under the Title III, Part B, and Institutional Services (IS) programs.

Activity Directors are responsible for the overall management and day-to-day operation of their approved activity. Additionally, Activity Directors are responsible to the Title III Office for matters related to the procedural and regulatory compliance of the activity. This includes reporting requirements: expenditure allocation, record keeping, and any modifications to the activity's budget and objectives. Only Activity Directors and designated support staff can initiate requests for expenditures and the requests must be based upon the approved Title III budget. Specifically, activity directors' responsibilities include:

1. Monitoring of Activity Expenditures

The Title III Activity Directors should monitor budgets weekly to ensure that all expenditures are allowable, allocable and justifiable as well as posted correctly.

2. Manage Account Deficits

The Title III Activity Directors shall review account activity on a weekly basis and submit budget revisions in a timely manner to clear up line item deficits according to federal expanded authorities. Activity staff shall review account availability prior to submitting requests to ensure that funds are in the correct line to avoid expenditure request rejections.

3. Assure that All Expenditures are Allowable, Allocable, Justifiable and Reasonable

Activity Directors shall ensure that expenditures address the agency-approved objectives and are necessary for the completion of the tasks associated with the activity objectives.

4. Adhere to Title III Project Administration Office Requirements

Activity Directors shall meet all deadlines for reporting requirements assigned by the Title III Project Administration office. Activity Directors will also participate in all Title III progress meetings and site visits (or designate a representative to attend if unavailable) to ensure that the activities are progressing as planned and approved by the U. S. Department of Education (IS) office.

5. Adhere to Federal Spending Guidelines

The Title III Activity Directors shall ensure that expenditures posted to the accounts are justifiable, allocable and reasonable as any prudent person would.

6. Adhere to Federal Grant Management Regulations

The Title III Project Administration staff, Activity Directors and University Administrators shall ensure that the sponsoring agency regulations and guidelines are adhered to, in order to preserve the University's position for receiving federal funding.