

# POLICIES & PROCEDURES HANDBOOK FY 2017-2018

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For an electronic copy of the Title III policies and procedures handbook please visit Title III website.

# **Using this Handbook**

This Policies and Procedures Handbook provides guidance and compliance directives on the implementation of the three Title III Programs: Strengthening Historically Black Colleges and Universities (HBCU), Strengthening Historically Black Graduate Institutions (HBGI) and the SAFRA mandatory grant at Alabama A&M University. It contains important information on grant terms and conditions for improving programs and services of the University using support from the Title III HBCU, HBGI and SAFRA Programs.

Administrative procedures for Title III HBCU, HBGI and SAFRA funded activities follow the approved policies and practices of Alabama A&M University. Please note: Federal Law (EDGAR) requirements and Federal auditing practices (OMB Circulars) may conflict with current University policies and practices. In all cases, Federal law will supersede policies and practices of Alabama A&M University. This Handbook will be updated annually; however, periodic updates may be required to ensure that the University's policies and procedures reflect applicable Federal guidelines and practices.

In support of our compliance efforts, this Handbook provides assistance to Activity Directors, Coordinators 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 the Handbook will be necessary to ensure compliance. All Activity Directors and Coordinators <u>must</u> become familiar with the grant requirements included therein, keep up-to-date on all administrative procedures and ensure that policies and procedures are followed carefully. All persons using Title III funds should refer to this Handbook before charging expenditures. Questions concerning Title III matters should be directed to Title III administrative personnel.

Department of Education General Administration Regulations: 34 CFR; as of June 23, 2005 Revised October 2016 - Policies & Procedures Handbook Title III Programs FY 2017-18

#### PURPOSE OF TITLE III STRENGTHENING GRANTS PROGRAM

Title III of the Higher Education Act of 1965, as amended, Strengthening Historically Black Colleges and Universities (HBCU) Program, authorizes a program of 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, but are struggling for survival and are isolated from the main currents of academic life. 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.

Alabama A&M University has three grants funded under Title III: (1) Historically Black Colleges and Universities (HBCU), (2) Historically Black Graduate Institutions (HBGI) and (3) Title III F SAFRA grant. Each program has funded project activities designed to help meet various University Strategic Goals.

# Activities that qualify for Title III funding under the HBCU Program are:

- Purchase, rental, or lease of scientific or laboratory equipment for education purposes, including instructional or research purposes;
- Construction, maintenance, renovation, and improvement in classroom, library, laboratory, and other instructional facilities, including purchase or rental of telecommunications technology equipment or services;
- Support of faculty exchanges, faculty and staff development, and faculty fellowships to assist faculty members in attaining advanced degrees in their fields of instruction;
- Academic instruction in disciplines in which Black Americans are underrepresented;
- Purchase of library books, periodicals, microfilm, and other educational materials, including telecommunications program materials;
- Tutoring, counseling, and student service programs designed to improve academic success;
- Funds and administrative management and acquisition of equipment for use in strengthening funds management;
- Joint use facilities, such as laboratories and libraries;

- Establishing or improving a development office to strengthen or improve contributions from alumni and the private sector;
- Establishing or enhancing a program of teacher education designed to qualify students to teach in public elementary or secondary schools in the state, that shall include, as part of such programs, preparation for teacher certification;
- Establishing community outreach programs that will encourage elementary and secondary students to develop the academic skills and interest to pursue postsecondary education;
- Establishing and maintaining an institutional endowment under 34-CFR part 628 to facilitate financial independence.

# Activities that qualify for Title III funding under the HBGI Program are:

- Purchase, rental, or lease of scientific or laboratory equipment for educational purposes, including instructional and research purposes.
- Construction, maintenance, renovation, and improvement in classrooms, libraries,
   laboratories, and other instructional facilities, including purchase or rental of
   telecommunications and technology equipment or services.
- Purchase of library books, periodicals, technical and other scientific journals, microfilm, microfiche and other educational materials, including telecommunications program materials.
- 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.
- Establishing or improving a development office to strengthen or improve contributions from alumni and the private sector.
- Assisting in the establishment or maintenance of an institutional endowment fund.
- Funds and administration management, and the acquisition of equipment, including

software, for use in strengthening funds, management and management information systems.

The full citation for the HBCU and HBGI programs can be found in 34 CFR, Parts 608 and 609.

# Activities that qualify for Title III funding under the SAFRA Program are:

- Purchase, rental, or lease of scientific or laboratory equipment for educational purposes, including instructional and research purposes;
- Construction, maintenance, renovation, and improvement in classroom, library, laboratory, and other instructional facilities, including purchase or rental of telecommunications technology equipment or services;
- Academic instruction in disciplines in which Black Americans are underrepresented;
- Purchase of library books, periodicals, microfilm, and other educational materials, including telecommunications program materials;
- Establishing or enhancing a program of teacher education designed to qualify students to teach in a public elementary or secondary school in the State that shall include, as part of such program, preparation for teacher certification, and
- 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.

HBCU 2017-18 FUNDED ACTIVITIES		
Administration	Dr. Andrea Cunningham	
Activity Name	Activity Director	
Optimizing Information Technology Services	Dr. Kimberley Marshall	
2. Enhancing Student Success and Engagement	Dr. Pamela Thompson	
3. Revitalization of Facilities Physical Infrastructure	Mr. Brian Shipp	

HBGI 2017-18 FUNDED ACTIVITIES		
Administration	Dr. Andrea Cunningham	
Activity Name	Activity Director	
Strengthening Information Technology/ Distance     Learning Support	Dr. Kimberley Marshall	
Strengthening Optics and Material Science Graduate     Program	Dr. M.D. Aggarwal	
3. Revitalization of Facilities Physical Infrastructure	Dr. Martha Verghese	
Strengthening Bio-Environmental Science Graduate     Program	Dr. Wubishet Tadesse	
5. Strengthening Contributions from Corporate, Governmental, and Philanthropic Entities	Mr. Archie Tucker	
6. Strengthening Computer Science Graduate Program	Dr. Jian Fu	
7. Strengthening Fiscal Stability and Administrative Management	Mr. Clayton Gibson	
8. Strengthening STEM Graduate Studies	Dr. Chance Glenn	
9. Strengthening Teacher Education Graduate Studies	Dr. Lena Walton	
10. Strengthening Physical Facilities	Mr. Brian Shipp	

SAFRA 2017-18 FUNDED ACTIVITIES		
Administration	Dr. Andrea Cunningham	
Activity Name	Activity Director	
<ol> <li>Establishing the Center for Excellence in Teaching &amp; Learning (CETL)</li> </ol>	Dr. Pamela Arrington	
2. Improving Retention through Enhanced Service	Dr. Malinda Gilmore	

#### MISSION OF THE UNIVERSITY

Alabama A&M University (AAMU) reflects the uniqueness of traditional land-grant institutions combining education, research, and service in professional, vocational, and liberal arts fields. AAMU provides baccalaureate, master's and doctoral level degrees that are compatible with the times to qualified capable individuals who are interested in further developing their technical, professional, and scholastic skills and competencies. It operates in the three-fold function of teaching, research, and extension public service. A center of substance and excellence, AAMU provides a setting for the emergence of scholars, leaders, thinkers and other contributors to society. Specifically, AAMU is committed to (1) excellence in education and creation of a scholarly environment in which inquiring and discriminating minds may be nourished: (2) the education of students for effective participation in local, state, regional, and international societies; (3) the search for new knowledge through research and its applications; (4) the provision of a comprehensive outreach program designed to meet the changing needs of the larger community; (5) programs necessary to adequately address the major needs or problems of capable students who have experienced limited access to education; and (6) the integration of state-of-the-art technology into all aspects of University functions. In cooperation with businesses, industrial and governmental agencies, and other institutions, AAMU provides a laboratory where theory is put into practice in a productive environment.

#### ORGANIZATIONAL STRUCTURE FOR PROGRAM ADMINISTRATION

To ensure University-wide programmatic and fiscal accountability for Title III, the Title III Director reports directly to the Office of the President, reporting directly to the Executive Vice President and Chief Operating Officer. Lines of authority, responsibility, and decision making outlined in the Alabama A&M University Policy Manual apply to Title III activities, as well as to other University programs.

The Title III Director works directly with each Vice President, Dean and Activity Director, as needed, to insure that all project objectives are achieved at the highest level. The ultimate success of each activity, however, rests with the respective Activity Director since Title III funds are designed to "supplement" rather than "supplant" University funds for programmatic support.

# **Title III Director's Responsibilities**

The principal responsibility for administering and managing all Title III activities rests with the Director who serves as a liaison among constituents of the University, the U.S. Department of Education, and other individuals or groups on matters which impact the Title III program.

The Director is responsible for monitoring the completion of objectives and outcome measures for all activities according to the approved Annual Grant Performance Report. Additionally, the Director manages and approves expenditures for all federal funds within the two Title III programs. As a government subcontractor, Alabama A&M University is bound by federal rules and regulations. Compliance with these guidelines is a necessary condition for funding the Title III programs. Specifically, the Director is responsible for:

- keeping the President apprised of the status of all Title III activities by working in close cooperation with Activity Directors and other relevant University personnel;
- providing overall leadership to the programmatic aspects of Title III;
- submitting Annual Grant Performance Reports and budget revisions when required;
- coordinating internal and external evaluations to assess program impact on all programs;
- disseminating Title III program information internally and externally;
- ensuring that the implementation process of Title III activities is consistent with the
   U.S. Department of Education guidelines and recommendations, as well as Alabama
   A&M University's policies, procedures, and line/staff relationships;
- approving all expenditures of the grant and monitoring daily Title III expenditures;
- assisting in the development of University-wide proposals, reports, and other documents related to the administration of Title III programs,
- cooperating with the Business Office to ensure that an efficient and effective system
   for fiscal control of Title III is maintained; and
- ensuring that all Title III activities remain consistent with the University's mission, goals, and long range plans.

# **Activity Director's Responsibilities**

The Activity Director is primarily responsible for carrying out the approved activity's plan, achieving of objectives, milestones, outcome measures, progress reports, and fiscal year budget parameters. Each Activity Director reports to the appropriate administrator within the existing administrative structure of the University. Specifically, the Activity Director is responsible for:

- preparing and submitting to Title III administration, complete and accurate progress
   reports of activity progress toward objectives;
- monitoring and reporting timely completion of activity objectives;
- requesting Title III funds via requisitions in accordance with approved activity budgets and University policies;
- approving travel requests;
- reviewing and signing monthly Time and Effort Reports. All Title III personnel <u>must</u>
   submit a Time and Effort Report monthly; and
- monitoring activity on the budgets.

#### PROGRAM EVALUATION

Evaluation of an activity determines the extent to which specified objectives have been attained. Additionally, it provides information relative to strengths and areas to strengthen for an activity. As a result of a comprehensive and effective evaluation, decision-makers and/or stakeholders can make the following decisions:

- 1. Which activity's aspects of a program to continue?
- 2. Which activities need to be revised/modified?
- 3. Which activities should be discontinued?

Two types of evaluations are typically conducted at AAMU:

- Formative to provide and process data on how well an activity is progressing toward completing the objectives. Recommendations may be made on how to best complete the objective.
- 2. **Summative** is a product end of the activity assessment. It provides data on the extent to which objectives have been completed and whether the activity should be continued.

#### FISCAL CONTROL OF TITLE III FUNDS

Alabama A&M University's Business Office oversees the management and accounting for all grant and contract funds. However, the fiscal and reporting policies of the U.S. Department of Education, through guidelines issued in the Education Department General Administrative Regulations (EDGAR) and rules in the Federal Registrar, require a more detailed management and recordkeeping system than is usually practiced by operating units of the University. Federal regulations require a complete accounting of <u>all</u> federal and University time and resources which directly impact the grant's activities.

#### FISCAL POLICIES AND REGULATIONS

- 1. A copy of each project's budget shall be transmitted from Financial Services to each project director after formal notification of grant approval has been received.
- 2. The University reserves the right to freeze Title III funds in cases where funds are misused or abused and/or where sufficient evidence exists that programmatic activities are not in compliance with the approved Grant Performance Report.
- 3. The ultimate authority for the use of funds, not expended at the end of the current budget period, has to be approved for carry-over through the Title III Office via the U.S. Department of Education. These requests must be received in the grants Office 45 days before the end of the budget period in which the funds are unexpended.

# **Budget Revisions and Transfer of Funds**

- 1. Budget revisions or transfers of a given line item may be made at the University level by making a written request to the Title III Director.
- The Title III Director must insure that budget revisions are approved by the U.S.
   Department of Education's Grants Officer prior to the expiration date of the grant or current grant budget period.

# **Budget and Programmatic Revisions Requiring Prior Approval**

- 1. Transferring amounts budgeted for indirect costs to absorb increases in direct costs.
- 2. Transferring amounts previously budgeted for student support.
- 3. Adding a new budget category that is not included in the approved budget or adding new items to existing categories.
- 4. Purchasing equipment that is not included in the approved budget. (If the revision involves the purchase of equipment, the brand name, model, and cost of each item must be included.)
- 5. Revising the project objectives or scope of activity.
- 6. Changing key personnel.
- 7. Adding foreign or domestic travel that is not in the approved budget.

# **Approval of Expenditures**

- 1. All requisitions using Title III funds must have the appropriate activity title and assigned budget number.
- 2. All requisitions using Title III funds must relate to an objective in the activity.
- All requisitions using Title III funds must be approved by the Activity Director, Department Chair/or Supervisor, Dean of the School (if requester is faculty), appropriate Vice President and the Title III Director, <u>before</u> being submitted to Financial Services for purchase
- 4. In all cases, the procurement process must be in conformance with EDGAR, Sections:
  - 74.44 Procurement procedures
  - 74.45 Cost and price analysis
  - 74.46 Procurement records
  - 74.47 Contract administration
  - 74.48 Contract provisions
- 5. An authorized representative of the Office of Information Technology Services must sign off on all computer purchases.

After one has properly prepared the requisition and attached all relevant documentation, including quotes/bids, signature procedures as established by the University should be followed.

The Title III Office will not process requisitions without appropriate authorizing signatures. Again, an authorized representative of the Office of Information Technology Center must sign off on all computer purchases.

# **Hiring Procedures**

Procedures used in hiring persons wholly or partially supported by Title III funds will be identical to those currently in practice at the University. The same approvals are required as would be required in hiring persons supported by institutional funds.

# **Time Reporting and Record Keeping**

The Federal government requires that grant recipients conduct time-keeping for all full-time and part-time employees assigned to grant projects. The following steps are to be used:

- A Time and Effort Report form is available on the Title III website or may be made available
  by request. Activity Directors, Administrative assistants, secretaries, faculty/staff,
  graduate student assistants are required to complete and submit a Time and Effort Report
  monthly.
- 2. The report should be signed by the employee and the Activity Director.
- 3. The report must be submitted to the Title III Office by the 5<sup>th</sup> day of each month

## TITLE III/UNIVERSITY REQUIREMENTS

- Approved Budget for each Fiscal Year
- 2. Final Performance Report for each Fiscal year
- OE Report ED Forms 851 and 852
- 4. Approved Job Descriptions
- 5. Monthly Time and Effort Report
- 6. Travel Reports
- 7. Consultant Services

- 8. Requisitions for Purchases
- 9. Evaluations (Internal and External)
- 10. Request for Personnel
- 11. Personnel Action Forms
- 12. Performance Progress Report
- 13. Annual Inventory of Equipment
- 14. Payroll Services Report
- 15. Financial Status Report (SF 269)
- 16. Budget Change Forms
- 17. Phase I Formula Grant Data

# **EXPLANATIONS FOR TITLE III DETAILED REPORTING REQUIREMENTS**

# 1. Approved Budget for Each Fiscal Year

The U.S. Department of Education requires that under a multi-year grant each activity budget must be submitted and approved prior to expending funds for the new fiscal year. This budget revision will reflect expenditures of the previous year and projections for the coming year, as approved in the Grant Performance Report. **All funds should be expended by the end of the budget period.** Funds remaining after September 30<sup>th</sup> will not be available for the next budget period. Remaining funds at the end of the budget year will be transferred to a priority account for University-wide use after September 30<sup>th</sup>

# 2. Grant Performance Report for Each Fiscal Year

The U.S. Department of Education requires a detailed Grant Performance Report for each new fiscal year under a multi-year grant. The Report includes accomplishments/outcomes for the current budget year, objectives, implementation strategies, expected outcomes, personnel needed to carry out objectives, evaluation schemes, budgets, and budget notes.

# 3. OE Reported ED 851-851a

These forms are included in the Grant Performance Report and must be prepared for each new fiscal year by each activity. ED Form 851, Activity Objectives and Anticipated Results, contains the specific objectives and anticipated results to measure success. The Implementation Strategy/Timetable Form contains the specific tasks to be completed.

# 4. Approved Position Descriptions

Each individual employed under Title III should have a copy of an approved position description on file in the Director's Office. The position description should be followed very closely. Federal funds awarded under this grant shall be used to supplement (increase the level of institutional funds), and in no case supplant (replace) institutional funds, e.g., moving regularly performed duties of individuals or costs to federal budget (Appendix 1).

# 5. Monthly Time and Effort Report

Each person employed under Title III must prepare and submit to the administrative office a monthly Time and Effort report.

- a. If Time and Effort Reports are not received in the Title III Office by 5:00 pm on the 5<sup>th</sup> of each month, requisitions will not be processed until reports from all personnel are submitted.
- b. Time and Effort Reports should be written in the past tense, the report should document specific actions completed monthly to achieve a specified objective cited in the Performance Report.

#### 6. Travel

Guidelines for travel follow the same general institutional travel policies. The following procedures and regulations must be followed when travel is supported by Title III

- a. Travel reimbursement documents should be submitted within fourteen (14) days after return from travel.
- b. Travel must be associated with one of the Title III project activities in a way that will lead to achieving project objectives. Only personnel on the Title III grant are eligible for travel.
- c. A brief written travel report must be submitted with the request for payment, summarizing highlights of the conference and its benefits. How experience/knowledge/skills was used to benefit the unit or university should be submitted when completed.
- d. Travel under the Title III activity will be in accordance with the approved operational plan of the Title III Proposal. Travel Request and approval will be in accordance with University Policy.

# 7. Consultant Services Request

a. Responsibility for contracting the services of consultants shall rest primarily with the respective Activity Director.

- b. All requests for consultants must be filed on a Request for Consultant Services Form at least two weeks in advance of the time service is to be rendered
- c. No consultant will be paid if prior approval from the appropriate sources as indicated on the appropriate form was not obtained.
- d. The Activity Director for the respective project must file the Consultant Report

  Form with the Title III Office within seven days after the consultant services have

  been rendered

The following information must be considered before submitting the Request for Consultant Services Form:

- 1. The consultant must qualify as an independent contractor.
- Consultant fees from federal funds may not be paid to a full-time employee of the federal government.
- 3. Services to be provided are essential and cannot be provided by persons receiving salary support in the area of responsibility.

# 8. Requisitions for Purchase

All requests must be prepared in accordance with University regulations and submitted to the immediate supervisor for signature of approval and sent to the Title III Office for final approval prior to the issuance of the purchase order. All requests should have the activity title, budget account number, and reference objectives prior to submission to the Business Office.

The purchasing of supplies, services, and equipment must conform to those items listed in the Title III budget notes.

# 9. Internal and External Evaluations

The Title III Director will schedule an annual internal and external evaluation which will consist of a program and a fiscal audit. This evaluation will involve all Title III activities. It will be the responsibility of the Business Office to arrange/or conduct the fiscal audit.

## 10. Personnel Action Forms and Personnel Action Forms Graduate Student Assistantships

A copy of employment, resignation, transfer, or termination of any individual employed under Title III should be on file in the Title III Office. These forms should originate and be returned to the Office of Personnel through the appropriate channels.

# 11. Performance Progress Report

Each Activity Director is responsible for preparing and submitting to the Title III Office a Mid-Year Progress Report of accomplishments in the activity. This report is due March 31 st of each year.

# 12. Annual Inventory of Equipment

Each Activity Director is responsible for the inventory of equipment. All equipment purchased with Title III funds must be tagged with the Title III Inventory tag as well as logged on the Title III Inventory Log. In addition, all equipment must be inventoried by the Department of Property Management.

# 13. Payroll Service Report

Each Activity Director is to have on file a copy of the Payroll Service Report each month for all personnel employed with Title III funds.

#### 14. Budget Change Form

All budget changes should be documented on the Budget Change Form and signed by the appropriate individuals prior to submitting it to the Title III Office.

# 15. Student Employment

Student employment under Title III funded Activities is an appropriate and beneficial use 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-add experiences for the students. Activity Directors are also expected to budget and closely monitor the expenditure of student wages. This should include ensuring that funds are available and adhere to all Department of Education and University regulations regarding student employment.

The Title III student employment process requires coordination with 1) Title III Administrative Office, 2) Office of Human Resources, and 3) Payroll. The decision to employ a particular student worker under Title III Programs rests solely with the Activity Director and the Title III Director. The following conditions apply to all Title III student workers:

- 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 tied to the specific funded Activity or the dayto-day operation of the unit directly supporting the activity.
- During the fall, spring and summer semesters, students may work up to twenty (20)
   hours a week.
- Students must be enrolled as full-time students during the Fall and Spring semesters and enrolled for at least 3 credit hours during the Summer term.
- Students may not under any circumstances work in more than one Title III funded position.

Additionally, Title III graduate assistants must adhere to the following:

- Student must arrange a suitable work schedule with supervisor and maintain that schedule.
- Student must give supervisor advanced notice (preferably 24 hours) if unable to work.
- Student will <u>not</u> exceed a 20 hour work week (inclusive of all jobs secured on-campus)
  while employed as a Title III graduate assistant. Student employee is not eligible to
  work overtime or receive compensatory time.
- Student is responsible for completing and adhering to student employment agreement policies and procedures of the Title III Office and policies of the university, to continue to receive Title III funds.
- Student will sign and submit a Time & Effort Report at the conclusion of each pay period to supervisor for approval and signature by the 5<sup>th</sup> day of the month following each pay period.

- Student will submit a Web Time Entry form online monthly, by the suggested date, in order to validate hours worked and ensure proper payment for time worked.
- Graduate Assistant position is available pending continued funding from the Title III Part
  B Strengthening HBCUs grant, which has a grant year that runs from October 1 to
  September 30.
- Students employed by the University for the first time, must complete the necessary paperwork in the Office of Human Resources.
- Student must be enrolled in at least 6 credit course hours during the Fall/Spring semesters and at least 3 credit course hours during the Summer semester in order to receive Title III funding.
- Student must submit a class schedule (proof of enrollment) before each semester to the
   Title III office.