

**POLICIES & PROCEDURES  
HANDBOOK  
2020-2021**

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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) Part B, Strengthening Historically Black Colleges and Universities (HBCU) Part F, and Strengthening Historically Black Graduate Institutions (HBGI) grants 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 Part B, Part F, and HBGI Program Activities.

Administrative procedures for the three Title III funded grant programs 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 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 **must** 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.

## **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) the Historically Black Colleges and Universities (HBCU) Part B grant, (2) the HBCU Part F grant, and (3) the Historically Black Graduate Institutions (HBGI) grant. Each grant program has funded project activities designed to help meet various University Strategic Goals that are aligned with the Department of Education's Legislative Allowable Activities (LAAs).

### **LAAs that qualify for Title III funding under the HBCU Part B 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.

**LAAs that qualify for Title III funding under the HBCU Part F (FUTURE Act) 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.

**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.

<b>HBCU Part B 2020-21 FUNDED ACTIVITIES</b>	
<b>Activity Name</b>	<b>Activity Director</b>
Program Administration	Dr. Andrea Cunningham
1. Optimizing Information Technology Services to Improve Student Success	Dr. Damian Clarke
2. Enhancing Student Success and Engagement	Dr. Pamela Thompson
3. Revitalization of Facilities Physical Infrastructure	Mr. Brian Shipp
<b>HBCU Part F 2020-21 FUNDED ACTIVITIES</b>	
<b>Activity Name</b>	<b>Activity Director</b>
Program Administration	Dr. Andrea Cunningham
1. Strengthening STEM Facilities	Mr. Brian Shipp
2. Enhancing the Freshman and Sophomore Year Experience for STEM Majors	Dr. Malinda Wilson Swoope
3. Expanding eLearning in STEM	Dr. Rhonda Moore Jackson
<b>HBGI 2020-21 FUNDED ACTIVITIES</b>	
<b>Activity Name</b>	<b>Activity Director</b>
Program Administration	Dr. Andrea Cunningham
1. Strengthening Information Technology/ Distance Learning Support	Dr. Damian Clarke
2. Revitalization of Facilities Physical Infrastructure	Dr. Martha Verghese
3. Strengthening Bio-Environmental Science Graduate Program	Dr. Wubishet Tadesse
4. Strengthening Contributions from Corporate, Governmental, and Philanthropic Entities	Dr. Archie Tucker
5. Strengthening Fiscal Stability and Administrative Management	Mr. Clayton Gibson
6. Strengthening STEM Graduate Studies	Dr. Zhengtao Deng
7. Graduate Student Writing Lab and Fellowship Program	Dr. John Jones
8. Strengthening Teacher Education Graduate Studies	Dr. Lena Walton
9. Strengthening Physical Facilities	Mr. Brian Shipp



## **MISSION OF THE UNIVERSITY**

Alabama Agricultural and Mechanical University is a public, comprehensive, 1890 land-grant institution committed to access and opportunity of education. We are dedicated to intellectual inquiry, the application of knowledge and excellence in teaching, research, and service, which is responsive to the needs of a diverse student population and the social and economic needs of the region.

The University offers contemporary baccalaureate, master's, educational specialist, and doctoral level degrees to prepare students for careers in the arts, sciences, business, engineering, education, agriculture and technology.

As a center of excellence, the University is dedicated to providing a student-centered educational environment for the emergence of scholars, scientists, leaders, and critical thinkers who are equipped to excel through their contributions and leadership in a 21st century national and global society.

## **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 three 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/encumbrances in accordance with approved activity budgets and University policies;
- Approving travel requests;
- Reviewing and approving monthly Time and Effort Reports;
- Reviewing and approving monthly staff telework logs (when applicable)
- Monitoring activity on the budgets.
- Ensuring all positions are filled in a timely manner

### **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:

1. **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 all federal and University time and resources which directly impact the grant's activities.

## **FISCAL POLICIES AND REGULATIONS**

1. A copy of each activities' budget shall be transmitted from the Title III Office to each activity 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.
2. 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.
3. 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, **before** 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. A representative from the Title III Office must be included in all search committees used in the hiring process of Title III supported (partially or fully) positions.

### **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:

1. Activity Directors, Administrative assistants, secretaries, faculty/staff, graduate student assistants are required to complete and submit a Time and Effort Report monthly (if effort is assigned to grant). *See additional conditions for Telework Log Reporting on page 14.*
2. The report should be signed by the employee and approved by the Activity Director.
3. The report must be submitted to the Title III Office by the 5<sup>th</sup> day of each month.

*The time and effort report form is available on the Title III website and is available upon request.*

### **TITLE III/UNIVERSITY REQUIREMENTS**

1. Approved Budget for each Fiscal Year
2. Final Performance Report for each Fiscal year
3. Approved Job Descriptions
4. Monthly Time and Effort Report (Telework Log, when applicable)
5. Travel Reports
6. Consultant Services

7. Requisitions for Purchases
8. Evaluations (Internal and External)
9. Request for Personnel
10. Personnel Action Forms
11. Performance Progress Report
12. Annual Inventory of Equipment
13. Payroll Services Report
14. Federal Financial Report (SF 424)
15. Budget Change Forms
16. 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. 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.

### **4. 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.

## 5. Daily Telework Log Reporting

Each person employed under Title III must prepare and submit a daily telework log in accordance with university policy regarding working from an alternative location due to restrictions akin to unavailability or allowance within campus facilities (i.e. COVID-19 guidelines as it relates to social distancing and safety precautions and regulations).

- a. Work plan description and schedule must be provided to and approved by respective Activity Director.

## 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.
- e. Travel provided within the continental United States (the 48 contiguous states; excluding Alaska and Hawaii). Support **will not** be provided for international travel.

## **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 should file a report 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.
2. 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 and End Year Progress Report of accomplishments in the activity.

#### **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. 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.

#### **14. 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.
- Only under the conditions that the university campus is CLOSED due to restrictions may a Title III supported student worker be allowed to work remotely. When campus is OPEN, student workers MUST work on campus to continue to their graduate research position.
- Student work assignments should be tied to the specific funded Activity or the day-to-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 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 **not** 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 Strengthening HBCU Part B, HBCU Part F, and HBGI grants, which have grant years that run 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 workers must be enrolled as full-time students 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.