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SPONSORED PROGRAMS: PROPOSAL, PRE-AWARD, and POST-AWARD POLICY

1.0 Purpose

Establish guidelines for college employees to submit proposals to outside sponsors for instruction, program, training, services or other related project support that involves specific requirements for performance on the part of the College.

2.0 Revision History

This is a new policy.

3.0 Applicability

This policy applies to all LFCC employees and governs college educational and workforce development programming, program and scholarly endeavors sponsored in whole or in part by outside entities including government and industry. It does not apply to gifts, contributions, or grants handled through the LFCC Foundation.

4.0 Policy

A sponsored program is an award from an external source (the "sponsor") for an agreed upon purpose with sufficient custodial responsibility to warrant unique administrative accountability. It is established by an agreement, usually called a contract, cooperative agreement, grant, purchase order or other document decided upon between the college and the sponsor. Sponsored programs are undertaken to augment college resources to enhance the college's program and educational programming, and to facilitate the ability of faculty members, staff members and students to develop and achieve their goals in educational programming, program and service delivery.

The proposal serves as the primary document upon which the college and a funding source agree to provide the facilities, funds and services necessary to perform the project development, program, service and/or training. Grants and contracts are made to the college and not the Program Director; therefore, college approval and involvement is required. The proposal specifies the obligation of the Program Director to perform services, the college to provide facilities and services, and the sponsor to provide support.

College employees who plan to submit a proposal to an outside sponsor must have the preliminary approval of their unit head and/or dean before contacting the LFCC Office of Institutional Advancement's Grant Services Coordinator to obtain the necessary forms to begin the formal process of a program proposal.

All external publicity on grants and contracts should be verified with the Program Director prior to release through the LFCC Office of Institutional Advancement.

5.0 Definitions

Contract: A mechanism for procuring a product or service with specific obligations for both sponsor and recipient. Typically, a program objective and the methods for achieving the objective are specified in detail by the sponsor, although some sponsors award contracts in response to unsolicited proposals. A contract is a legally binding document.

Cooperative Agreement: An award similar to a grant, but in which the sponsor's staff may be actively involved in proposal preparation and anticipates having substantial involvement in program activities after the award has been made.

Cost Sharing: The portion of the total project costs of any sponsored agreement that is not provided by the sponsor.

Direct Costs: Clearly identifiable as being related to a specific project. General categories of direct costs may include but are not limited to communication and travel, contractual services, equipment and computer use, fringe benefits, salaries and wages, supplies.

Facilities and Administrative Costs: Incurred for common or joint objectives and, therefore, cannot be identified readily and specifically with a particular sponsored project, an instructional activity or any other college activity. Facilities and administrative costs are synonymous with indirect costs.

Facilities and Administrative Rate Agreement (Indirect Costs): A negotiated agreement with the Department of Health and Human Services, aka Negotiated Indirect Cost Rate Agreement (NICRA). The rates shall be applied consistently to all applicable sponsored-program activity at the college, including all federal, nonfederal and industrial sponsors.

Grant: A type of financial assistance awarded to an organization to conduct a program or other programs as specified in an approved proposal. A grant, as opposed to a cooperative agreement, is used whenever the sponsor anticipates no substantial programmatic involvement with the recipient during the performance of the activities. Most grants are made to fund a specific project and require some level of compliance and reporting.

In Kind: Contributions or assistance in a form other than money, such as equipment, materials or services of recognized values.

Program Director (Project Director): The individual with the responsibility for conducting the program or other activity described in a proposal for an award. The terms "Program Director" or "Project Director" may be used interchangeably.

Proposal: A formal written description concerning the conduct of program, training or technical assistance with the support of an external sponsor. The proposal represents an offer by the college to perform the activities specified and contains all information necessary to describe project plans, staff capabilities and funds requested. The college's review and approval process assures compliance with both sponsor and college policies.

Sponsored Programs: Projects or programs that are conducted by faculty member(s) and/or administrative staff member(s) and supported - fully or in part - by external restricted funding awarded to the college. Sponsored programs may be program, instructional or service in nature. In all sponsored programs, the college has obligations to the funding source in accordance with the terms of a proposal or agreement. In the case of a proposal, these obligations are based on the project description developed by the faculty member(s) and/or administrative staff member(s). In the case of a grant, these obligations are based on the project description developed jointly by the sponsor and the faculty member(s) and/or administrative staff member(s).

Sponsor/Funding Agency:

Federal, state or private agencies external to the college who provide support for a program or project at the college.

Total Direct Costs: The total of all direct costs of a project.

Total Project Costs: The total allowable direct and indirect costs incurred by the institution to carry out an approved project or activity.

6.0 Responsibilities

The Office of Institutional Advancement provides the state-mandated central review process for all external funding requests, adhering to regulations set by the federal government, the Commonwealth of Virginia, Virginia Community College System (VCCS) and the college. The Office of Institutional Advancement serves the college as the administrative voice in the negotiation and acceptance of all grants and contracts. The Program Director and Director of Budget and Finance are responsible for subsequent modifications. The Grant Services Coordinator is responsible for the following in addition to performing other duties as directed by the Associate Vice President of Institutional Advancement:

1. Disseminating information relating to external funding by considering previously developed or undeveloped projects/programs or identifying funding opportunities consistent with college's mission, vision, values, or strategic plan
2. Assist faculty and administrators with project/program development in advance of Request for Proposal (RFP), aka on shelf and ready, as appropriate
3. Coordinate RFP review, identify sponsor's evaluation criteria and application package and submission requirements, compile information on sponsor's mission and program goals including target population and anticipated deliverables
4. Obtain post-draft proposal approvals, finalize application package, coordinate with Program Director application submission

5. Maintaining appropriate records including internal college approvals

Administrators, deans and directors are responsible for reviewing, approving, monitoring and supporting projects of interest to their areas of responsibility. Only those individuals designated by the president as signatory authority for all sponsored programs administered through the college are empowered to sign documents on behalf of the institution. The college is not committed to accept awards resulting from the submission of proposals not authorized by the college.

The Program Director is responsible for conducting the project in accordance with college policies, submission guidelines from the agency and applicable federal regulations under the terms of the grant or contract. Any arrangements with the grantor for any major changes in the original agreement must be made through the appropriate offices in conjunction with the Director of Budget and Finance. The Program Director must have the technical competence and substantive capabilities to carry out a sponsored project. Therefore, the Program Director is responsible for preparing the Internal Budget Form and coordinating matters of financial activity, personnel and position changes with the proper college departments.

The Office of Institutional Advancement is responsible for releasing all external publicity on sponsored programs, projects, grants and contracts.

The Director of Budget and Finance is responsible for the following:

1. Creating an account in the financial accounting system
2. Establishing a post award grant file
3. Monitoring the financial activity of the sponsored project
4. Providing periodic, at least quarterly, expenditure reports

7.0 Procedures

Procedures for Sponsored Program Management Proposal and Pre-Award

Contracts, grants, program agreements and sponsored-award documents are legal instruments that bind the parties to the terms stated therein. Therefore, state and federal laws as well as VCCS and Lord Fairfax College policies and regulations must be followed when preparing, accepting, signing and executing such legal documents. Thus, all proposals - whether new or continuing - must be processed through the Office of Institutional Advancement for formal college approval and signature before they are submitted to external sponsors. The Office of Institutional Advancement serves as the administrative voice in the negotiation and acceptance of grants and contracts. The Program Director and Director of Budget and Finance administer subsequent modifications.

All proposals soliciting external support, whether from federal, private or state agencies, call for some commitment of college resources. Therefore, approval from those responsible for the administration of college resources must be obtained prior to the formal submission of the proposal.

1. Faculty and staff members who wish to pursue sponsored programs should receive preliminary approval from their administrator, dean, or director, then, contact the Grant Services Coordinator to coordinate the review and proposal process. Questions concerning faculty time commitments, space and facilities, as well as proposed new courses and/or

requirements, should be resolved during the review process. All early correspondence including any letters of intent in initial solicitation efforts are to be routed through the Grant Services Coordinator.

2. If the sponsor complies with Federal Executive Order 12372, Intergovernmental Review Process, requiring that state and regional clearinghouses be notified of the intent to apply for funds. Such notification is transmitted on Standard Form 424 and should be submitted at least 30 days prior to submitting an application for funds.
3. The Grant Services Coordinator and/or Program Director should contact the Grant Fiscal Agent early in the review process for guidance concerning the calculation of project costs to include current federally negotiated facilities and administrative costs (indirect costs) and appropriate fringe benefit costs. The Program Director should verify equipment estimates with the LFCC Office of Procurement Services.
4. The Grant Services Coordinator coordinates review and approval of proposals prepared for submission. If subsequent review reveals that the submitted proposal contains errors, inaccuracies and/or misrepresentations, is incomplete, or does not conform to sponsor or college requirements, the Program Director shall be responsible for making appropriate changes or withdrawing the proposal.
5. The Grant Services Coordinator will review the completed proposal for compliance issues and for budget consistency.
6. The signed proposal is returned to the Grant Services Coordinator, who will provide a copy of the approved proposal to the Program Director for final review, then, coordinate submission under the requirements of the sponsor. The Grant Services Coordinator maintains records of internal college approvals and a copy of the proposal for the official college file.
7. The file is considered funded when the award document is received from the sponsoring agency. A copy of the award document is disseminated to the Grant Services Coordinator, Program Director, and Director of Budget and Finance.

Procedures for Sponsored Program Management Post-Award

1. All funds received for sponsored programs are under the fiscal control of the Director of Budget and Finance. These funds must be receipted and disbursed in accordance with college policy, state and federal law, and sponsored programs' restrictions (including 2 Code of Federal Regulations (2 CFR,) (Grants and Agreements Part 200; Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards). 2 CFR is commonly referred to as Uniform Guidance, if applicable.
2. Full-time faculty members and employees may be paid for additional services performed under sponsored program. However, authorization for compensation in excess of the regular salary must be in accordance with the procedure set forth in LFCC Policies and allowable under the terms of the sponsorship agreement.
3. The Program Director will work directly with Grant Fiscal Agent for the financial management of the project.
4. Upon receipt of the signed sponsorship agreement the Director of Budget and Finance will establish a post-award fiscal project file, create an account in the financial accounting system, provide periodic expenditure reports to be used by the Program Director for making

financial decisions related to the sponsored project. The Grant Fiscal Agent will monitor financial activity of the sponsored project.

5. All budget revisions must be coordinated with the Director of Budget and Finance through the Grant Fiscal Agent.
6. The Director of Budget and Finance is responsible for drawing funds, invoices for payment, reimbursement requests, grantor-required fiscal reports, and other financially related documents for review and distribution on a timely basis. Post-award non-fiscal reporting is the responsibility of the Program Director.
7. At the close of a project, unexpended funds will be disposed of according to the provisions of the terms and conditions of the sponsoring agency.
8. Specific Office of Human Resources requirements must be followed for Sponsored Program staff.

8.0 Interpretation

The authority to interpret this policy rests with the president and is generally delegated to the Vice President of Finance and Administration and Associate Vice President of Institutional Advancement.

9.0 Authority/Reference

VCCS policy, Section 4, Administration and Finance (General Fiscal Affairs), Acceptance of Gifts, Grants, and Contracts, Section 4.5, 4.5.2, General Provisions

W.K. Kellogg Foundation, 1998 (updated January 2004), Logic, Model Development Guide, used with permission of the W.K. Kellogg Foundation

College and University Business Administration, Chapter 18, Research and Sponsored Programs