# **Policy 232: Grant Administration**

Category: Business Operations

Covered Individuals: All CEI Employees, Students, and Trustees

Approved: 4/25/2023

**232.1 Policy**

College of Eastern Idaho encourages faculty and staff to seek additional funding in the form of grants from federal, state, and local governmental agencies, business organizations, and private foundations provided the project is within the scope of the mission of the department and college.

Each Department seeking a grant shall provide advance notice to the appropriate authorities (Director of Grants, Procurement Office, Business Office, CEI Foundation, President’s Advisory Council, and/or any department impacted by grant requirements) so that the effects on the College of Eastern Idaho (budget, cash flow, procurement requirements, financial reporting, or compliance requirements) can be reviewed, understood, and approved beforehand.

A grant Agreement and/or Acceptance of Terms and Conditions provided by the grantor upon award decision, must be signed prior to any financial or business affair grant activity takes place. The authority to bind the college to the terms and conditions of an agreement has been delegated to the Vice President of Finance and Administration.

The purpose of this policy is to ensure that every grant application submitted by the College of Eastern Idaho for federal, state, local, or private grant funding is consistent with and adheres to best practices and the College of Eastern Idaho’s priorities. Following the policy will ensure that all grant funding is recorded in the College of Eastern Idaho’s financial system of record.

**232.2 Definitions**

A grant is defined as financial assistance awarded to the College of Eastern Idaho from an external entity to carry out a specific purpose, or when specifically identified by the awarding agency, as a “Grant” at the time of the award. A grant is a multi-defined instrument used by the College of Eastern Idaho to subsidize programs and projects that fit within the funding criteria of each respective grantor.

Grant funds can either be unrestricted or restricted. Unrestricted funds may be broadly used to fulfill the recipient organization’s activities. Restricted funds may only be used for specific purposes as defined by the grantor.

Grant agreements are legal contracts. It is the College of Eastern Idaho’s responsibility to carry out grant activities to accomplish its objectives while adhering to the regulatory and budgetary terms and conditions prescribed by the grantor in the grant agreement. Failure to do so exposes the College of Eastern Idaho to legal liability and compromises current and future grant funding.

**232.3 Procedures**

The College of Eastern Idaho carries a significant legal and ethical responsibility when accepting grant funding, and management of grant awards requires heightened awareness throughout the organization.

Generally, grants may supplement but NOT supplant state and local funds. Supplanting occurs when a state or unit of local government reduces state or local funds for an activity, specifically because federal funds are available (or expected to be available) to fund that same activity. This is prohibited under federal grants. Supplementing, occurs when federal funds are used to enhance existing state or local funds for program activities.

Grants come with special requirements that the College of Eastern Idaho must fulfill. For example, as a condition of the grant itself, a grant may commit the College of Eastern Idaho to financially maintain a program or asset after the expiration of the grant. An effective grants policy and procedure is necessary to provide guidance to staff as it relates to associated processes and procedures in order to maximize the benefits and minimize the risks.

The College of Eastern Idaho’s requirements, processes, responsibilities to compliance requirements, and related liabilities accompanying the receipt of such grants from grantors are identified in the supporting Grant Procedures.

The procedures provide a framework of internal controls that standardizes grant management and administration in developing, implementing, and maintaining oversight, including the approach for applying, approving, and implementing grants.

Funding through grants is encouraged as a means of financing projects or one-time expenditures. Programs and projects funded by grant assistance shall generally be reduced or eliminated when such revenue sources are reduced or eliminated, provided sufficient ongoing funds cannot be identified.

1. **Grant Discovery-**
   1. To begin research: Staff or faculty identifies need and requests grant research; staff or faculty finds a possible grant opportunity or the Director of Grants identifies potential grant and notifies specific departments.
   2. Contact is made with the Director of Grants for the grant process to begin.
2. **Pre-Application**
   1. Staff or faculty completes the “Intent to Apply/Risk Assessment” form and submits it to the Director of Grants with the notice of solicitation attached.
   2. The “Intent to Apply” will be reviewed for viability and distributed to other departments that may have input, involvement, or interest in the grant. Advance notice to the appropriate authority (Director of Grants, Executive Director of CEI Foundation, Procurement Office, Business Office, President’s Advisory Council, and/or any other department impacted by the grant requirements) will be provided so that the effects on the college can be reviewed and understood beforehand.
      1. The Budget Office and Procurement will be informed of grant requirements prior to application submission to ensure compliance with federal, state, and local laws, and regulations, and that the College of Eastern Idaho’s Procurement Policy, Budget, and Accounting requirements are met. The Procurement Office will be instrumental in obtaining quotes for goods and services to be included in the application process.
      2. The grant office will review the “Intent to Apply Form” checking for possible collaborative opportunities with other grants or fundraising initiatives. The grant office will also check for possible conflicts with other CEI grant applications, ensuring that any proposed grant-funded activities are appropriate to the mission of CEI, and ensure that the proposed activities are in alignment with college policies.
      3. The Risk Assessment Section will be completed by the reviewing departments.
      4. Upon Approval, the grant office will notify the applicant to proceed with the application process in coordination with the grant office and procurement office.
3. **Grant Application**
   1. All grant applications, awards, and contracts *must be approved* in consultation with the Director of Grants, Executive Director of CEI Foundation, Procurement Office, Business Office, President’s Advisory Council, and/or any other department impacted by the grant requirements, to ensure that the terms are reasonable, applicable, and administrable.
   2. All written grants must conform with applicable College of Eastern Idaho and/or CEI Foundation accounting policies and budget requirements.
   3. Designation of a principal investigator and financial manager will be assigned as appropriate.
      1. The Person applying for a grant is generally designated as the Principal Investigator.
      2. The Vice President of Finance and Administration is the authorized signor for the College of Eastern Idaho to accept awards. The Director of Grants is authorized to sign approving grants in the event the VPFA is unavailable to sign in a timely manner.
      3. The Executive Director of CEI Foundation is the authorized signor to accept charitable awards.
   4. The Principal Investigator in cooperation with the Director of Grants is responsible for submitting to the Grantor any documentation prior to any due dates (reports, pictures, invoices, policies, data, etc.). If the proposal or grant is charitable in nature, the CEI Foundation Executive Director should be consulted.
   5. Ensure that requested grant funds do not violate “supplanting” regulations.
4. **Grant Award Announcement**
   1. Upon receipt of a grant award, notices shall be forwarded to the Director of Grants and the CEI Foundation Executive Director seeking approval and signatures of all award documents.
   2. Upon approval, send a copy of the fully executed grant award including any compliance or adherence forms to the Director of Grants and the CEI Foundation Executive Director for review and the establishment of the grant budget.
   3. The Principal Investigator is responsible for developing an implementation plan promptly upon approval of the grant award. All grant funding must be managed in coordination with the Director of Grants and any other departments that may be impacted by the project. The Procurement Office and IT will track all equipment with serial numbers, purchase date, vendor, description, location, and asset sticker numbers.
   4. The Principal Investigator and Director of Grants must notify;
      1. The Budget Director to set up an account code
      2. The Grant Accountant for tracking of expenses and preparation of claims
      3. The CEI Foundation Executive Director will track expenses if it is a charitable grant.
5. **Grants Involving Match**
   1. Sources for a grant should be identified in coordination with the Business Office, Director of Grants, and the CEI Foundation Executive Director (if it is a charitable grant), prior to application. Any match should be included in the College of Eastern Idaho budget process as appropriate.
   2. All “soft” matches for personnel will be provided in timekeeping software. The Principal investigator will ensure that all grant personnel submits their time appropriately for the grant to cover the cost.
6. **Expending Grant Funds**
   1. Departments receiving grant funding will purchase goods or services in accordance with grant requirements and the College of Eastern Idaho Procurement Policy. The Procurement Office is available for the guidance and review of grant-related purchases and requirements.
   2. The Procurement Office should be involved with any purchasing needs from Intent to Apply through the final purchase.
      1. CEI shall not award grant assistance or contracts that use federal grant funds to any potential contractor, subcontractor, or sub-awardee that is debarred or suspended, or otherwise excluded from or ineligible for participation in Federal assistance programs under Executive Order 12549.
7. **Receipt of Grant Money**
   1. If grant advance funds are available, a request will be made as soon as possible.
   2. Reimbursement-type grant funds should be requested per grant requirements.
   3. Financial reimbursement requests may be requested by the Business Office, CEI Foundation, or Principal Investigator dependent on the grant requirements, logins, and setup.
   4. Program Managers must work with the Business Office to draw-down funding to ensure that financial reporting and requests for reimbursement are accurate. Ensure reimbursement PAYMENTS are made payable to: College of Eastern Idaho 1600 S. 25th E, Idaho Falls, ID 83404 or via ACH-Setup information can be obtained through the Business Office. PAYMENTS for grants from charitable organizations should be payable to: CEI Foundation, at the same address. ACH-setup can be obtained through the CEI Foundation.
8. **Payment from Grant** 
   1. It is the responsibility of the Principal Investigator in cooperation with the Procurement Office to ensure that any potential vendor, contractor, subcontractor, or sub-awardee that will be funded through a grant award is not prohibited from receiving federal or state funds due to suspension or debarment by checking **Sam.gov.**
   2. Invoices should be examined for compliance to grant specifications as well as the usual College of Eastern Idaho expenditures requirements and submitted for payment following the general accounting procedures.
   3. Expenditures must fit within grant periods, amounts, and category types and contain proper coding and authorization.
9. **Grant Modifications**
   1. Written permission from the grantor must be obtained for grant time extensions or changes to original grant classifications and budgets.
10. **Grant Compliance File**
    1. The Business Office will maintain a compliance file structure that includes at least the following sections: Solicitation/Notice of Funding (NOF), Submittal, Award, Financial, and Reports.
    2. The Director of Grants may review the Compliance File for completion, and assist outside Auditors and Grantors with any audits.
11. **Grant Reporting**
    1. Financial activity/reports are produced by the Business Office.
    2. Program reports are produced by the Principle Investigator.
    3. The Principal Investigator is responsible for the grant Closeout Process.
    4. Upon completion of the grant term for each grant award, the recipient Department shall notify the Director of Grants to finalize the fund accounting.
    5. The Principal Investigator should forward copies of all grant documents to the Director of Grants as they are created/received. Grant documents from charitable organizations should be forwarded to CEI Foundation Executive Director.
    6. Records and source documents pertaining to the grant award should be retained for at least three years following grant closeout or longer if required by the grantor, College of Eastern Idaho, state, or federal laws; using the time frame that is the most restrictive. For federal grant funds, records must be retained as specified in 2 CFR 200. CEI must ensure they comply with retention requirements specified by each grantor.