

COAHOMA COMMUNITY COLLEGE

**Title III/SAFRA
Policy & Procedures Manual**

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PREFACE

This *Policy and Procedures Manual* facilitates the implementation of activities funded by the U.S. Department of Education (Title IIIB and Student Aid and Fiscal Responsibility Act (SAFRA)). It is designed to provide specific policies and procedures unique to the programs, to support the proper monitoring and evaluation of program activities and to ensure the appropriate expenditure of program funds. This Manual serves as a resource document in carrying out the approved plan.

Compliance with the guidelines and regulations included in this Manual will ensure that the grant is administered in accordance with legislations, regulations, the U. S. Education Department General Administrative Regulations (EDGAR), and other Federal directives, and affirms that the College has the documentation necessary to show compliance.

This Manual will be updated periodically as changes in policies are made by the U. S. Department of Education and the College. It is effective until replaced by an updated version.

NOTE: This manual governs Title IIIB and SAFRA unless otherwise stated.

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INTRODUCTION

History of Title III

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 stream of academic life. Amendments to the Act have altered some of the elements of the program, but it remains basically as written, an instrument to provide assistance to institutions demonstrating a constructive effort to strengthen themselves.

Under the Strengthening Historically Black Colleges and Universities Program, Part B, grants are awarded to HBCUs to assist in establishing and strengthening physical plants, academic programs, faculty and staff development, fiscal management and student services. The grant amount was based upon a statutory formula set forth in 608.31 of the regulations.

History of Student Aid and Fiscal Responsibility Act

The Student Aid and Fiscal Responsibility Act of 2009 (SAFRA) is legislation implementing President Obama's American Graduation Initiative. The bill would end the Federal Family Education Loan program and shift all student loans to the Federal Direct Loan program. The resulting savings, estimated at around \$87 billion over a ten-year period, would be applied to a broad range of programs and policies, including increases in the Pell Grant and Perkins loan programs, significant new funding for community college initiatives, early childhood education reform, and school infrastructure. SAFRA provides \$1.275 billion in funding for Historically Black Colleges and Universities and Hispanic Serving Institutions at \$255 million a year for five years.

Purpose (SAFRA's purpose mirrors Title IIIB and allowable activities are indicated by an asterisk (*))

The purpose of Title IIIB is to provide financial assistance to establish or strengthen the physical plants, financial management, academic resources, and endowments of historically black colleges and universities (HBCUs).

Title III of the Higher Education Act of 1965, as amended, Strengthening Historically Black Colleges and Universities (HBCU) authorizes 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. 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.

Title III has funded project activities designed to help meet various strategic goals of the College. Activities that qualify for Title III funding are:

1. Purchase, rental, or lease of scientific or laboratory equipment for educational purposes, including instructional and research purposes.*
2. Construction, maintenance, renovation, and improvement in classrooms, libraries, laboratories, and other instructional facilities, including purchase or rental of telecommunications and technology equipment or services.*
3. Support of faculty exchanges, faculty development, and faculty fellowships to assist in attaining advanced degrees in the field of instruction of the faculty.
4. Academic instruction in disciplines in which Black Americans are underrepresented. *
5. Purchase of library books, periodicals, and other educational materials, including telecommunications program material.*
6. Tutoring, counseling, and student service programs designed to improve academic success.
7. Funds management, administrative management, and acquisition of equipment for use in strengthening funds management.
8. Joint use of facilities, such as laboratories and libraries.
9. Establishing or improving a development office to strengthen or improve contributions from alumni and the private sector.

10. 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.*
11. Establishing community outreach programs which will encourage elementary and secondary students to develop the academic skills and the interest to pursue postsecondary education.
12. Establishing or improving an endowment fund.
13. Acquisition of real property in connection with the construction, renovation, or addition to or improvement of campus facilities.
14. Education or financial information designed to improve financial literacy and economic literacy of students or the students' families, especially with regard to student indebtedness and student assistance programs under Title IV.
15. Services necessary for the implementation of projects or activities that are described in the grant application and that are approved, in advance, by the Secretary, except that not more than two percent of the grant amount may be used for this purpose.
16. Other activities that a grantee proposes in its application that contribute to carrying out the purposes of the Title III legislation and are approved by the Secretary as part of the review and acceptance of the grant application.

In addition to LAAs 1, 2, 4, 5, and 10 (marked with asterisk (*) above) SAFRA funds may also be utilized for:

Other activities, consistent with the institution's comprehensive plan and designed to increase the institution's 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

Federal assistance under these programs may not be used to cover any general operating and maintenance expenses of grantees or to supplant what an institution would otherwise spend to carryout activities allowed in the programs.

USING THIS MANUAL

This *Policy and Procedures Manual* provides guidance on the implementation of the Programs awarded to Coahoma Community College.

The purpose of this *Policies and Procedures Manual* for Coahoma Community College's Programs is to ensure:

- that resource use is consistent with Coahoma Community College policies and procedures and with U. S. Department of Education policies;
- that grant resources are safeguarded against waste, loss, and misuse;
- that reliable data are obtained, maintained, and fairly reported;
- that personnel are of a quality commensurate with their responsibilities;
- that records are adequate to support that the College essentially carries out the project as described in the application (or as appropriately modified); and
- that our system of authorization and recording is adequate to provide effective accounting control over revenues and expenditures.

Distribution of the Policy and Procedures Manual

This Manual is designed to give directions to administrators, faculty, staff and activity directors or for persons interested in the HBCU Program at the College.

The Title III Coordinator will give each full-time employee funded by Coahoma's Title III Program a copy of the *Policy and Procedures Manual*. Employees will be expected to familiarize themselves with the Manual and to follow its requirements. The Manual will be posted on the College's website making it available to interested members of the College community. Additional copies of the Manual will be available in the Title III Office (Federal Programs Office).

FUNDED ACTIVITY, ACTIVITY DIRECTOR, & ACTIVITY ABSTRACT

HBCU-Strengthening Historically Black Colleges and Universities 2012-2017:

Activity Title: Program Management and Evaluation

Ms. Marilyn M. Starks, *Title III Coordinator*

The purpose of this activity will be Project Administration and Evaluation in order to: 1) design each activity so that it will address one or more goals or objectives in the college's Long Range Strategic Plan; 2) process project expenditure requests in such a way that each satisfies institutional, state, and federal regulations and requirements; 3) monitor and evaluate progress, including seeing that needed adjustments are made; 4) serve as the college's official Title III project representative by attending pertinent local, state, regional, and national meetings; and 5) submit the required and requested reports related to the Title III project to both internal and external individuals and agencies.

Activity Title: Enhancing Instructional Programs

Mrs. Yolanda Morton, *Activity Director*

This activity will place emphasis on the instructional programs, faculty and staff professional development, and program implementation. The programs will also assist students with their technology disability needs while pursuing their education. This activity will implement a new Automotive Technology program of study.

Additionally, this activity over the course of the next five years plans to positively impact persistence, retention, and graduation rates through improving developmental education; advancing instructional technology; enhancement to science, technology, engineering, and math (STEM) disciplines; and enrollment management.

Activity Title: Improving Student Success through Student Services

Ms. Lashasa Griffin, *Activity Director*

This activity will provide students with services that address their needs from enrollment to graduation. Services include tutoring, mentoring, leadership training, health/wellness, retention, and directed services to the African American male.

Additionally, this activity, over the next five years, will assist students in overcoming academic difficulties, adjustments difficulties, managing finances, and employability skills. The health/wellness component will not only include health related activities (yoga, aerobics, Zumba, planned workouts on the fitness equipment, etc.) but will also include a nutrition component and healthy living/ healthy lifestyle activities.

By making the student aware of these services at enrollment and engaging them while they matriculate, retention and graduation rates will be increased.

Activity Title: Strengthening Funds and Administrative Management

Ms. Marilyn M. Starks, *Activity Director*

This activity will target campus technology infrastructure. It will improve software, hardware, employee training, information management, equipment and software maintenance, and communication (e-mail, voicemail, telephone, etc.).

Over the next five years this activity proposes to upgrade Jenzabar software and servers; upgrade campus bookstore server and software; upgrade Powerfaids (financial aid) software; upgrade uninterruptable power supply (UPS); obtain a backup generator; provide a backup to the storage area network system (SANS); insure that the campus is 100% wireless; upgrade software and hardware in student computer labs across the campus; and upgrade and enhancement other technology as needed. By providing the campus with consistent, cutting-edge technologies, retention and graduation rates will be positively impacted.

Activity Title: Enhancing Learning Resource Center

Mrs. Rose Lockett, *Activity Director*

This activity will enhance the overall collection (books, DVDs, CDs, on-line resources, etc.); increase the availability of library resources to all students (day, night, and on-line); and implement an information literacy program, designed to provide all students with the skills necessary to assist in making them life-long learners, proficient researchers, assessors, assemblers, and users of information.

Over the next five years, the information literacy program in this activity will be a component of all freshmen English, World Literature, and orientation courses. Additionally the learning resource center (LRC) has its own evaluation tool (LIBQUAL) which is completed by each participant after any LRC sponsored training, seminar, or workshop. The feedback allows for immediate assessment of what is working and what is not, leading to revisions in programs and services as need.

This activity will help build a strong foundation for college matriculation, sustainability and retention.

Activity Title: Strengthening the Associate Degree Nursing (ADN) Program

Mrs. Beverly Overton, *Activity Director*

The purpose of this activity will be strengthening the ADN program. This activity will train students to become qualified nurses and provide them with the tools and skills needed to pass the NCLEX-RN to become Registered Nurses.

Additionally, this program will hire a Student Navigator. This individual will guide or steer students around barriers to successful program completion by referring students to appropriate identified resources.

Over the next five years, this activity will have an increased technology component that will include computerized assessment and assistance in entrance exams, remediation needs, course exams, and licensure exams.

With the high degree of student maturity and engagement in the teaching-learning process, the components of this activity will positively impact student success, not only in this program but also as they further their education or join the workforce.

Activity Title: Improving Physical Plant

Mr. Jerone Shaw, *Activity Director*

This activity will seek to maintain an environment conducive to teaching and learning through continuous renovation and enhancements of academic facilities.

Over the next five years, funding requested for this activity will be used to continue to provide a campus environment that is aesthetically pleasing, physically safe, technologically efficient, and meets the needs of the college.

Activity Title: Improving Institutional Development

Mrs. Rita S. Hanfor, *Activity Director*

This activity seeks to provide a coordinated effort to provide students and the service area with artistic opportunities that will give them experiences of cultural variety in an educational context through lectures (motivational speakers), performing arts, theater, etc. This activity will also bridge the communication link between the college and its stakeholders.

Over the next five years, this activity will be in constant contact with stakeholders regarding the events and programs of the college. Additionally, a part-time development coordinator will assist in grantwriting.

Student Aid and Fiscal Responsibility Act (SAFRA) 2015-2020

Activity Title: Program Management and Evaluation

Ms. Marilyn M. Starks, *Title III Coordinator*

The purpose of this activity will be Project Administration and Evaluation in order to: 1) design each activity so that it will address one or more goals or objectives in the college's Long Range Strategic Plan; 2) process project expenditure requests in such a way that each satisfies institutional, state, and federal regulations and requirements; 3) monitor and evaluate progress, including seeing that needed adjustments are made; 4) serve as the college's official SAFRA representative at pertinent local, state, regional, and national meetings; and 5) submit the required and requested reports related to SAFRA to both internal and external individuals and agencies.

Activity Title: Enhancing Allied Health Programs

Mr. Tony Brooks, *Activity Director*

The purpose of this activity will be to provide an array of Allied Health programs of study that will 1) ensure that the majority of students admitted to a Allied Health program will complete the program of study and graduate; 2) ensure that the pass rates on the appropriate certification exam will meet or exceed the state or national rate; and 3) ensure that faculty and staff have professional development opportunities to stay abreast of innovative trends in their chosen Allied Health discipline.

Activity Title: Improving the Practical Nursing (PN) Program

Mrs. Beverly Overton, *Activity Director*

The purpose of this activity will be to demonstrate its ability to meet expressed program outcomes such as 1) ensuring that the majority of students admitted to the nursing program will complete the program of study and graduate; 2) ensuring that the pass rates on the NCLEX-PN for nursing graduates will meet or exceed the state or national rate; and 3) ensuring that faculty and staff have professional development.

GOVERNANCE STRUCTURE

This section describes the key individuals involved in the planning and administration of the Title III & SAFRA grants. They are the President, the Title III Coordinator, the Assistant Title III Coordinator, and the Title Activity Directors.

President

The President assumes overall responsibility for the leadership of the Title III/SAFRA Programs. The President views Title III/SAFRA as an effective use of federal resources to support the College's Comprehensive Development Plan and to move the College from its current period toward a state of institutional viability.

Title III Coordinator and Assistant Title III Coordinator

The primary administrator for the Title III/SAFRA projects is the Title III Coordinator. Reporting directly to the President, the Coordinator assumes full operating responsibility for grant management, and consultative responsibilities for the administration of all activities. The Assistant Coordinator reports to the Coordinator and assumes full operating responsibility in the absence of the Coordinator.

Because of the complexity and importance of the grant to the institution, the Title III Coordinator dedicates 90 percent time to the administration of the Title III/SAFRA grants.

The role of Title III Coordinator will be:

- To acquire a total sense of the programmatic thrusts;
- To establish effective communication with the President to ensure that the program operation is consistent with the goals of overall institutional development;
- To ensure the development of an effective evaluation system to measure program impact on institutional development;
- To assist in the recruiting of key personnel;
- To coordinate the activities in such a way as to facilitate maximum utilization of staff and other program resources;
- To serve as the designee of the President;

- To become knowledgeable of Title III policies and grant terms and conditions so the program operates with total compliance with regulations throughout the funded period;
- To supervise all budget aspects of the Title III grant;
- To receive monthly printouts from the Chief Financial Officer on the status of the program budget; and
- To collaborate with the President and Chief Financial Officer for accountability of expenditures.

Activity Directors

Activity Directors have the direct responsibility and accountability to operate activities in keeping with the terms and conditions of the Title III/SAFRA grants. Activity Directors will be supervised by, and will immediately be responsible to, the administrative head of their major unit; for Title III/SAFRA purposes, they will report to the Title III Coordinator's Office. The role of Activity Director will be:

- To provide day-to-day coordination of all program activities generated by respective activities;
- To submit requested reports monthly;
- To collaborate activity expenditures with the Title III Coordinator;
- To develop and submit job descriptions for all persons funded under, or directly affected by the respective Title III activity;
- To maintain current inventory of activity equipment;
- To establish effective communication mechanisms to ensure activity operations are consistent with the institutional goals; and
- To assist in the recruitment of activity personnel.

Reporting Structure

- The Title III Coordinator reports to the President of the College.
- Activity Directors report to the Title III Coordinator.
- The Assistant Title III Coordinator and the Federal Programs Specialist report to the Title III Coordinator.
- Faculty and all other positions funded by III/SAFRA report to the Activity Directors. Job descriptions for each position funded by Title III may be found in the Title III Office.

ADMINISTRATIVE POLICIES

Coahoma Community College has established policy and procedures for the effective and efficient administration of the Title III/SAFRA programs and personnel. The following administrative policies are applicable:

- All governing policies and procedures of the College are applicable to Title III/SAFRA personnel and activities.
- No commitments, which require the use of the Title III/SAFRA funds, which are not specifically included in the approved Title III/SAFRA grants shall be made. Questions concerning this should be directed to the Title III Coordinator and clarity sought prior to making such commitments.
- All requests involving expenditures from Title III/SAFRA budgets must be forwarded to the Office of Institutional Advancement/Federal Programs by the Activity Director to ensure clearance for allowability and availability of funds prior to submission to the Business Office for final processing and prior to making any commitments. **Requests should be forwarded to the Federal Programs Office in sufficient time (3 to 5 working days) to allow for clearance prior to processing. All Title III/SAFRA charges must be made to the appropriate line item.** Funds designated for one line item may not be used for another line item, unless approval has been granted by the Title III Coordinator.
- The College is required to spend Title III/SAFRA funds in a manner consistent with the provisions of the final approved plan. If modifications are necessary to the objectives of a particular activity as the program progresses, then such changes should be reflected in budgetary revisions. Budget revisions must be within Federal guidelines and must have the approval of the Title III Coordinator and the President.
- All requisitions must be forwarded directly to the Title III Coordinator's office for clearance prior to final processing by the Business Office.
- Under no circumstances should a business arrangement be made with an outside vendor without satisfying all administrative requirements.
- Reimbursements will only be made for expenditures that were pre-approved prior to purchase, and original receipts must accompany requests for reimbursement through Title III/SAFRA.

Fiscal Management

The Business Office is responsible for maintaining accounting records on a consistent basis and in accordance with accounting principles acceptable to the United

States Department of Education. All requisitions are submitted to the Federal Programs Office for approval on Thursdays prior to any further processing.

College policy regarding the use of Federal Funds is as follows: All federal funds received by Coahoma Community College will be deposited in a restricted account. Coahoma Community College will exercise fiscal control in accordance with all state laws and with relevant College regulations and procedures. Federal funds will also be subject to State and Federal audits and to all applicable federal guidelines.

In addition to the above procedures, the Assistant Title III Coordinator under the supervision of the Title III Coordinator shall maintain an independent set of records for Title III funds. The Title III Coordinator and Assistant Title III Coordinator monitor closely the grant and any contracts to ensure the appropriate and timely expenditure of funds. The Title III Coordinator has the direct responsibility for approving payments, purchases, hiring, and for all other non-program matters related to the Title III/SAFRA grants.

Changes Requiring Prior Approval

Some changes to Title III/SAFRA projects require prior approval from the Department of Education in Washington. If a request for a change that requires prior approval is made, the Education Department General Administrative Regulations (EDGAR) that govern Title III/SAFRA, an allowance of 30 days for a response from Washington is required before implementing the change.

The following changes require prior approval:

- Change in the scope or the objective of the Project (even if there is no associated budget revision requiring prior written approval)
- Change in a key person specified in the application or award document

- The absence for more than three months (or a 25% reduction in time devoted to the Project) by the Director
- Unless described in the application and funded in the approved awards, the sub award, transfer, or contracting out of any work under an award

Changes Not Requiring Prior Approval:

Under the "Expanded Authorities," Title III grant recipients are no longer required to ask permission for minor changes in their programs. Instead, recipients are free to make minor modifications as long as:

- The change supports the objectives of the grant, and
- The change and the reasons for it are clearly documented in the grant's records.

Coahoma Community College Title III/SAFRA projects clearly reflect the needs of the institution, and major changes in the Projects' objectives should be rare. The Title III Coordinator and the President shall approve proposed changes. Any change will be appropriately documented and available in the Title III office.

If it becomes apparent that the Project will not be able to achieve an objective within the timeline specified by the grant, the timeline may need to be modified. The Title III Coordinator will report such changes to the President so that s/he can prescribe appropriate action.

Requests to Redirect the Use of Funds

Requests made to the United States Department of Education to redirect the use of funds should follow these guidelines:

1. The budget item to be reduced must be identified and the reduction fully justified.
2. Budget items to be increased must be identified along with the amount of the increase and the amount originally approved. The increase must be fully justified.
3. Revisions that involve the purchase of equipment must include the brand name, model description and number, and cost of each item. Purchases should be more economical than rental and lease-purchase agreements. Requests must include a cost analysis and comparison of the alternatives.

4. The letter of request must be signed by the Activity Director and the Title III Coordinator. A request without these signatures will not be processed.
5. The request must be received at least 10 working days prior to the expected implementation date.

Personnel

This category includes all full-time and part-time employees who are supported by Title III/SAFRA funds. Hiring procedures will follow College policy. The Title III Coordinator must be consulted to ensure that the hiring of persons for Title III/SAFRA activities is within the framework of the approved plan and to ensure that appropriate funds are available to accommodate the action. Title III/SAFRA funds may not be used to supplant the use of College funds in the hiring process. *Individuals hired should clearly understand that they are being supported by Federal funds and that their employment is contingent on the receipt of those funds and the overall success of their Activity.*

Fringe Benefits

Fringe benefits are available to persons supported by Title III/SAFRA funds, as allowed by College policy. Benefits are available to regular employees who work a normal schedule of at least 35 hours per week. For more information on these benefits, employee eligibility, and effective date please refer to the College's *Policy and Procedures Manual* or contact the Human Resources Office.

Record Keeping and Retention

The United States Department of Education requires the College to keep records that provide an accounting of all funds under the grant, how the grant funds were used, the total cost of the project, and other records to facilitate an effective audit. The College must keep records that show compliance with program requirements and records that show significant project experiences and results. These records must be retained for five years

after the final financial report has been submitted for the activity for which the funds were granted.

The Secretary of Education, Inspector General of the United States, or any of their authorized representatives have the right of access to any books, documents, papers, or other records of the grantee which are pertinent to the grant, in order to make audit, examination, excerpts, and transcripts. The right of access is not limited to the required retention period but lasts as long as the records are retained.

Budget Information

Although Title III/SAFRA funds are necessary for grants administration, the College shall provide office space, and other overhead expenses, business office bookkeeping necessary for the management of this grant.

Obligation of Funds During The Grant Period

The College may use grant funds only for obligations it makes during the grant period. All requisitions should be submitted in ample time for the obligation to be made within the grant period.

Contracts

Cost associated with sub-grants and payments to cooperating institutions or agencies is defined as contract costs. Payments to individual consultants are not included under this classification.

Consultants

Approval to use consultants other than those identified in the application for Title III funds must be procured. To use such a consultant, complete the "Contract for Consultant Services" form. Consultant tasks must be performed in accord with the objectives stated in the approved grant.

Consultants may be engaged to assist in Activities only as described in the Activity budget and with prior approval of the Title III Coordinator. Consultants are normally used either as workshop presenters or as experts who provide advice or a service. Information as to the need for a consultant is to be provided on the Approval/Request for Consultant Services Form (see College website for forms or contact the Office of Federal Programs). After the Approval/Request for Consultant Form has been signed by the Title III Coordinator and approved by the President or his/her designee, a contract shall be signed by the Consultant and submitted to the Title III Coordinator for payment. This form should be submitted with an accompanying requisition for payment to the Business Office.

When a consultant is engaged to provide on-campus training, (workshops, seminars, etc.) documentation of this effort in the form of a program outline and evaluation of the program by participants needs to be attached to the Consultant Statement of Work Form. Payment will be made only after documentation of services has been received and approved by the Activity Director and Title III Coordinator. Travel related expenses can be paid to a consultant upon request from the Activity Director with appropriate documentation, but these costs must be included on the Approved/Request for Consultant form. When budgets contain approval for contracted services with an organization (this approval appears in the contract line item of the Activity budgets), negotiation of the contract must be channeled through the Title III Coordinator's office to ensure compliance with federal regulations covering such service.

Miscellaneous Expenses

- Direct costs for items, which are not covered in any of the previously mentioned classifications are included here.

Examples are communications, transportation (freight, parcel post, etc.), space, equipment rental, computer use charges, and consultant fees and expenses.

- Each approved fiscal year budget forwarded from the Title III office to individual Activity Directors will contain budget line item number for each line item.

Unallowable Cost

For each type of institution, there is a set of cost principles for determining allowable and unallowable cost. Allow ability of cost are determined in accordant with the cost principles applicable to the institution incurring the cost. Selected unallowable costs associated with institutions of higher learning are listed below. This list is not exhaustive and you are encouraged to consult OMB Circular A-21 Section J for the complete list:

Advertising and public relations costs: Costs of meetings, conventions, convocations, or other events related to other activities of the institution, including: (a) Costs of displays, demonstrations, and exhibits; (b) Costs of meeting rooms, hospitality suites, and other special facilities used in conjunction with shows and other special events; (c) Salaries and wages of employees engaged in setting up and displaying exhibits, making demonstrations, and providing briefings; (d) Costs of promotional items and memorabilia, including models, gifts, and souvenirs; and (e) Costs of advertising and public relations designed solely to promote the institution.

Alcoholic beverages: Costs of alcoholic beverages are unallowable.

Alumni/ae activities: Costs incurred for, or in support of, alumni/ae activities and similar services are unallowable.

Commencement and convocation costs: Costs incurred for commencements and convocations are unallowable.

Entertainment costs: Costs of entertainment, including amusement, diversion, and social activities and any costs directly associated with such costs (such as tickets to shows or sports events, meals, lodging, rentals, transportation, and gratuities) are unallowable.

Fund raising and investment costs: Costs of organized fund raising, including financial campaigns, endowment drives, solicitation of gifts and bequests, and similar expenses incurred solely to raise capital or obtain contributions, are unallowable.

Memberships, subscriptions and professional activity costs: Costs of individual membership in business, technical, and professional organizations are unallowable. Costs of individual subscriptions to business, professional, and technical periodicals are unallowable. Costs of membership in any civic or community organization are unallowable. Costs of membership in any country club or social or dining club or organization are unallowable.

Pre-agreement costs: Costs incurred prior to the effective date of the sponsored agreement, whether or not they would have been allowable if incurred after such date, are unallowable unless approved by the sponsoring agency.

Selling and marketing: Costs of selling and marketing any products or services of the institution are unallowable.

Student activity costs: Costs incurred for intramural activities, student publications, student clubs, and other student activities, are unallowable, unless specifically provided for in the sponsored agreements.

Expenses Not Covered

The Title III Coordinator will establish procedures for handling expenses not covered in any of the areas discussed in this Manual on a case-by-case basis.

Transfer of Funds

Due in part to a provision cited in 34CFR [74.25] of EDGAR, the transfer of funds from one Activity to another during a grant year is permitted with the approval of the Title III Coordinator and the President. In general, grantees no longer have to seek departmental approval for budget transfer in non-construction projects except as stated in [74.25] (c) and in cases where the Department has imposed a 10% limitation on cumulative budget transfers for grants over \$100,000, [80.30] (c) (1)(ii).

Budget Transfers

All budget transfer requests:

- Must be to carry out activities that are within the approved scope of the application;
- Must meet the test of reasoning or reasonability and allowability; and
- Must meet other Federal statutes, regulations, and grant conditions.

The Title III Coordinator cannot process requests for payment of Activity expenses unless all required documentation is submitted. The various forms required to support fiscal monitoring of the Title III grant are detailed in this Manual. The person making the

request may obtain additional copies of these forms. A copy of all documentation associated with the fiscal management of Title III/SAFRA funds shall be retained in the Activity Director's and Assistant Title III Coordinator's files.

Budget Revisions

The procedures for requesting budgetary revisions are the same as those for the regular programs of the College with some modifications.

- The Request for Budget Revision form may be obtained from Federal Programs Office.
- The form must be returned to Federal Programs signed by the Activity Director.
- When the review and approval form is completed by the Title III Coordinator, the Request for Budget Revision form will be forwarded to the Business Office.

Activity Directors are expected to carefully monitor their program objectives and related expenditures to ensure that milestones are being completed in a timely manner and that expenditures are commensurate with accomplishments.

Time and Effort Reporting Requirements

The Department of Education requires the College to document and maintain Time and Effort Certifications on all federally supported employees. Internal procedures have been developed to ensure adherence to this requirement.

- Each year the Title III Coordinator notifies each activity director of all employees supported by a federally funded program.
- Each employee is required to complete a Time and Effort Report Form and submit to the Office of Federal Programs each month (see College website for forms or contact the Office of Federal Programs).
- Copies of completed Time and Effort Certification Forms are to be maintained in the Activity file in the Office of Federal Programs.

Annual Report to the Department of Education

Each year the Director, Assistant Director, Federal Programs Specialist, and the Activity Directors will collaborate on the preparation of the Annual Performance Report

(APR) to the U.S. Department of Education. This report will include information that demonstrates Coahoma Community College's substantial progress toward meeting the objectives of each component of the Project as required by EDGAR section 75.253(2)(i). The APR is normally due in December of each year.

External Evaluation

An independent external evaluator at the discretion of the College President will evaluate the entire Title III/SAFRA grants, as well as the individual Title III/SAFRA activities. The evaluator will conduct both a formative and a summative evaluation. Evaluators will look at all aspects of grant activities including a comparison of actual accomplishments to the goals established for the period, documentation and project expenditures, as well as the effect of the project in strengthening the overall operation of the College.

Procurement Policies

In order to obtain the goods and services needed to carry out activity objectives, follow the College's policy and procedures. Any deviation might result in delays in acquiring what is needed. When the items are on competitively bid state contracts, the commodities must be purchased from the contracted supplier at the specified prices unless there is some special exemption. Under this arrangement, orders less than \$2,500 do not require bids. More specific and detailed procedures are provided in the *Coahoma Community College Policy and Procedures Manual*.

Purchasing

All requests for supplies, equipment, services, rentals, subscriptions or any other transactions that involve an expenditure of Title III/SAFRA funds require the initiation of

a purchase requisition. Requisitions for goods or services in the amount of \$2,500 to \$14,999 require two quotes and goods and services in the amount of \$15,000 or more must be let out for bid when the items are not covered by already competitively bid contracts (items on the state's express products list). Original copies of the three (3) lowest bids must accompany the requisition.

Requisitions for supplies and equipment are initiated by the Activity Director and must be submitted in accordance with the established College procedures for the purchase request. Care must be exercised to insure that contract grant funds are expended only for budgeted items and that the total amount of funds provided are not exceeded.

Requisition Process

Procedures governing requisition of supplies, equipment, travel and payment for services rendered by College personnel apply equally to staff and faculty in Title III Activities. The standard requisition form used (see College website for forms or contact the Office of Federal Programs) of the College must be. Purchase requisitions are used to give the Purchasing Department detailed and specific information regarding items to be purchased. The requesting individual, usually the Activity Director, must adequately describe its procurement needs. The requisition should, at a minimum, be typed or legibly written and include the following information:

- Vendor and address: Enter the vendor's name, address and telephone number in the spaces provided.
- Department: Division, or Title III Activity initiating the request.
- Date: Indicate the current date of the requisition.
- G/L Code: Include the affected budget code to be charged. If unsure about account information, please verify with the Assistant Title III Coordinator or the Federal Programs Specialist prior to document submission.
- Quantity: Indicate the amount/quantity needed for each item.

- Item Number: All items should reflect the necessary item numbers.
- Description: Clearly state the description of supplies, materials or equipment, and service specifications.
- Unit Price: Indicate the per unit (each) price/cost of the requested items. If more than one unit is being ordered, multiply the quantity column by the unit price to get the Line Total. These columns must be completed before submission to the Office of Federal Programs.
- Requested by: The signature of the person requesting the order should be entered in the space provided. The signature of the Activity Director must be reflected on the document in order for the Assistant Title III Coordinator to continue processing the request.
- The Title III Director must sign all requisitions.

Once the order has been completed by the Purchasing Department, the purchase order will be sent to the requester/Activity Director and a copy should be forwarded to the Office of Federal Programs. All invoices should be forwarded to accounts payable for payment.

Supplies

"Supplies" means materials or provisions stored and dispensed when needed.

- Grantees should purchase supplies from Title III/SAFRA funds only in amounts reasonably expected to be required for the performance of the grant Activity.
- Supplies should be procured on a timely basis to reflect use of the supplies during the period of grant support.
- Although there is no requirement for accountability for supplies similar to that for equipment, the Activity Director/Coordinator is expected to maintain those records necessary to support the purchase-receipts and proper charge of supplies in accordance with good management practice.

EQUIPMENT

According to regulations (*EDGAR*), equipment is tangible non expendable personal property including exempt property charged directly to the award having a useful life of more than one year and an acquisition cost of \$5,000 or more per unit. By College definition, however, equipment constitutes almost any electronic devices especially those with a cost of \$500 or more. Additionally, the College has other restrictions that require inventory controls that must be followed.

An equipment inventory form must be completed and provided to Title III Administration for all equipment purchases; in addition, a statement that clearly identifies the system in effect (which ensures that adequate safeguards are in place to prevent damage or theft to the equipment) should be included on the inventory form. The purchase of equipment with Title III/SAFRA funds may be permissible only after receiving approval from the Title III Administration.

General Purpose Equipment

Approval must be obtained to acquire with federal funds any general purpose permanent equipment, i.e., any items which are usable for activities, such as office equipment and furnishings, reproduction or printing equipment, etc., or any automatic data processing equipment.

Limitations on Purchase of Equipment

Only items listed in the final approved Activity should be purchased without further approval from the United States Department of Education. Some changes can be authorized by the Title III Coordinator, without Department of Education approval. To order equipment included in the approved final plan, complete a Purchase Requisition form according to the instructions listed under procurement.

Moving Equipment

Equipment is approved for use in the assigned Title III/SAFRA Program Activity only and should be moved only if the Activity is being moved to different quarters. The Title III Coordinator must maintain information on the location and use of all equipment purchased with Title III/SAFRA funds. Each year, the Office Federal Programs will request an inventory of equipment. The Title III Coordinator must be notified prior to the relocation of any equipment or furniture items.

The equipment must be available for inspection by the Director, by external evaluators, and by site visitors from the United States Department of Education.

All requests to move Title III/SAFRA equipment should be made to the Title III Coordinator. Please use the proper inventory form (see College website for forms or contact the Office of Federal Programs) which may include but may not be limited to, the Request to Transfer Equipment Form and a Work Order. Copy the inventory department on all forms.

Computer Purchases

In adherence to the College's centralization of microcomputer hardware and software, activity directors should consult the Office of Information Technology to discuss proposed computer acquisitions.

Sole Source Procurement

Sole Source Procurement occurs when only one vendor is known to supply a particular item requested for purchase. This method of purchasing involves no competition and should be avoided as much as possible. If used, the sole source procurement should be justified and well documented. Evidence of such documentation should be retained for record-keeping purposes. Final responsibility in determining whether an item is a proprietary item and should be purchased from a sole source is determined by the Business Office.

Emergency Purchases

Purchases made under emergency conditions must be limited to those goods and/or services required to meet the emergency condition. Such emergencies are defined as:

"A condition, which creates a threat to the health, welfare or safety of staff and/or students. Situations, which endanger lives, property, or the continuation of vital programs."

TRAVEL

Travel with Title III funds is allowable only for travel expenses identified in the approved grant application. All changes in approved travel must be justified. Travel requests not identified in the approved application, requires approval from the Title III Coordinator.

Specific Travel Policies and Procedures

1. Persons whose travel is supported by Title III/SAFRA funds should complete a Travel Request Form for Travel with Title III/SAFRA funds. Attach pertinent information/details regarding travel to justify the expenditure of funds and have travel itineraries approved prior to the actual travel.
2. Within five (5) days after return from travel, travelers must submit original travel expense receipts and the approved Travel Reimbursement Form to the Title III/SAFRA Coordinator. Reimbursable original receipts must be documented.
3. Automobile travel will be reimbursed at the rate of **.565** cent per mile or at current approved state rate) when submitted on the proper form for reimbursement. *(Note: Subject to College policy at the time of submission)
4. Automobile rental is only allowable for travel when it is clearly the more cost effective method of travel.
5. Prior approval is required for all travel.
6. Prepayment checks are allowed only for transportation (airline), hotel, and registration costs payable to applicable vendor.
7. When a traveler purchases his or her own airline ticket, reimbursement will occur after travel.
8. Failure to submit original expense receipts and the Travel Request form may result in non-payment, and it may adversely affect consideration for future travel using Title III /SAFRA funding during the fiscal year.
9. While the Office of Federal Programs will process authorized travel requests as expeditiously as possible, such requests must be submitted at least five (5) working days in advance of the travel.

Travel by Public Carrier

Employees who travel by airline or other public carriers are required to have all travel arrangements (transportation, lodging, etc.) handled by approved travel agency. The travel agent will send the traveler an itinerary which will include airline confirmations. A copy of this itinerary must be attached to the travel reimbursement form for reimbursement. Allowable

travel expenses include meals, lodging, registration fees, and other expenses that might require approval before such expenditures are incurred. More information is provided in the *Coahoma Community College Policy and Procedure Manual*.

Note: Travel Advances are not given to the employee by the College.

Reimbursement for Approved Travel

After travel has been taken, prepare a Travel Reimbursement form of Expenses for Official Travel. To the form, attach the approved agenda, airline ticket receipt (if reimbursement is sought), the airline travel itinerary, receipts for taxi fares, hotel accommodations, fees, and other reimbursable expenses. Secure the appropriate signature and submit the package to the Title III Coordinator.

Allowable Reimbursable Expenses

Airline tickets, ground transportation, parking, hotel, meals (per diem/per day), registration costs, conference fees, conference materials, telephone calls to campus, mileage (.565 cent per mile or current rate approved state rate) are allowable expenses, and must be submitted with supporting receipts and the approved documentation in order to receive reimbursement.

D I R E C T O R Y

Title III 2012-2017:

Mrs. Marilyn Starks Title III Coordinator	Project Administration (662) 621-4154
Ms. Marilyn M. Starks Activity Director	Improving Financial and Academic Management (662) 621-4154
Mrs. Yolanda Morton Activity Director	Improving Instructional Programs (662) 621-4678
Ms Lashasa Griffin Activity Director	Enhancing Student Success through Student Service (662) 621-4146
Mr. Jerone Shaw Activity Director	Improving Physical Plant, Maintenance & Transportation (662) 621-4177
Mrs. Rose Lockett Activity Director	Improving the Learning Resource Center (662) 621-4161
Mrs. Rita Hanfor Activity Director	Enhancing Institutional Development (662) 621-4161
Mrs. Beverly Overton Activity Director	Enhancing an Associate Degree Nursing Program (662) 621-4686

Student Aid and Fiscal Responsibility Act (SAFRA) 2015-2020:

Mrs. Marilyn Starks Title III Coordinator	Project Administration (662) 621-4154
Ms. Beverly Overton Activity Director	Improving the Practical Nursing Program (662) 621-4678
Mr. Tony Brooks Activity Director	Enhancing Allied Health Programs (662) 621-4146