

***TITLE III PROGRAMS
POLICIES AND PROCEDURES MANUAL***



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Thank you to the Department of Education for this capacity building grant opportunity for Fisk University. Fisk University will comply with the program purposes and regulations. We are privileged to having this funding for the next four years to better serves our students.

FORWARD

The Fisk University Title III Policies and Procedures Handbook provides guidance and compliance directives on the implantation of the two Title III Programs Part B Strengthening Historically Black Colleges and Universities (HBCU) and Part F Future Funding (also referred to as the mandatory grant.) It contains important information on grant terms and conditions for improving programs and services of the University using funding through Title III HBCU and Part F Programs.

The administrative procedures for Title III HBCU and Part F funded approved policies and practices of Fisk University are consistent with EDGAR and 2 CFR 200 Section E -- the federal regulations which govern the administration and expenditure of Title III funds. Please note the requirements and Federal auditing practices (OMB Circulars) may conflict with current University policies and practices. In all instances, Federal law and regulations supersede the policies and practices of Fisk University.

To further the College's commitment to compliance with regulations, this manual aid Activity Directors and other key personnel in carrying out the activity objectives and implementation strategies set forth in the approved Plan of Operation. It is to be used as a guide for ensuring adherence to all guidelines and regulations.

As grant requirements and/or federal regulations change, revisions or additions to the manual will be necessary to ensure continuing compliance. All Activity Directors must become familiar with grant requirements included herein, keep up to date on all administrative processes, and ensure that policies and procedures are followed carefully. It is envisioned that all Activity Directors providing leadership to Title III-funded activities will refer to this manual before making personnel commitments and/or obligating Title III funds. Questions concerning Title III matters should be submitted to the Title III Director who can be reached at bbaber@fisk.edu.

MISSION/VALUES OF THE UNIVERSITY

Fisk University produces graduates from diverse backgrounds with the integrity and intellect required for substantive contributions to society. Our curriculum is grounded in the liberal arts. Our faculty and administrators emphasize the discovery and advancement of knowledge through research in the natural and social sciences, business and the humanities. We are committed to the success of scholars and leaders with global perspective.

The **D.E.T.A.I.L.S.** represents Fisk's core values. Our values reflect our overall ethical and moral engagement. We, the Fisk Family, seek to internalize these principles and apply them in our day-to-day work, our relationships with our colleagues and students, and in our lives.

Diversity: We believe that our individual differences are a collective strength. We will support and encourage diversity of opinion and of culture which aids us in building a collective wisdom that results in more powerful and relevant solutions to our challenges.

Excellence: We believe that excellence is the result of a lifelong pursuit of the highest standards. At Fisk, our collective quest is to earn merit through commitment to rigorous scholarship, cultural literacy, and high ethical standards.

Teamwork: We believe that individuals achieve high standards when supported by the collective work of others. We reinforce this value by constantly creating opportunities to collaborate both inside and outside of traditional alliances at our University, our proximate community, and the world.

Accountability: We believe that we must hold ourselves to the highest standard when we make commitments. Consistent and measurable follow-through is essential for individual and team progress. We are forthright about our successes and shortcomings and we will position Fisk for continued achievement.

Integrity: We believe that it is our responsibility to prepare young people to be stewards of an ever-changing world. That means that we must model behavior grounded in truthfulness and compassion.

Leadership: We believe that leaders are obligated to empower those around them. We are consistent, transparent, and accountable. Through our words and behaviors, we encourage others to exhibit these same attributes.

Service: We believe that service is our ability to give the gift of knowledge to humanity. As we service, we become transformed and so are our communities.

PURPOSE OF TITLE III STRENGTHENING GRANT PROGRAMS

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 aid institutions demonstrating a constructive effort to strengthen themselves.

Fisk University has two grants funded under Title III, the: (1) Part B, referred to as the Historically Black Colleges and Universities (HBCU) and (2) Part F, also referred to as the Future Funding or mandatory grant. Each program has funded project activities designed to help meet various University Strategic Goals.

Legislative Allowable Activities (LAAs) that qualify for Title III Part B funding include:

- 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.

Legislative Allowable Activities (LAAs) that qualify for Title III Part F funding include:

- 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.

Overview of Title III Part B and F Allowable/Unallowable Activities

HBCU Program Allowable Activities¹

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

¹ The legislatively allowable activities for Title III Part B programs are listed in the Section 323 of the Higher Education Opportunity Act (HEOA) as amended, and the 34 CFR Section 608.10.

10. 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.
11. Instituting community outreach programs that will encourage elementary and secondary students to development to develop the academic skills and interest to pursue postsecondary education.
12. Other activities that it proposes in its application that contribute to carrying out the purpose of this part and are approved by the Secretary as part of the review and acceptance of the application.

HBGI Master's Program Allowable Activities

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. Purchase of library books, periodicals, technical and other scientific journals, microfilm, microfiche, and other educational materials, including telecommunications program materials.
4. 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.
5. Establishing or improving a development office to strengthen or improve contributions from alumni and the private sector.
6. Assisting in the establishment or maintenance of an institutional endowment fund.
7. Funds and administration management, and the acquisition of equipment, including software, for use in strengthening funds, management, and management information systems.

Future Funding Program Allowable Activities

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 classroom, library, laboratory, and other instructional facilities, including purchase or rental of telecommunication technology equipment or services.
3. Academic instruction in disciplines in which Black Americans are underrepresented.
4. Purchase of library books, periodicals, microfilm, and other educational materials, including telecommunications program materials.
5. 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
6. Other activities, consistent with the institutions comprehensive plan and design 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 professionals.

UNALLOWABLE Activities: HBCU², HBG³, and Part F

1. Activities that are not included in the grantee's approved application.
2. Activities described in allowable (12) of this section that are not approved by the Secretary.
3. Activities that are inconsistent with a state plan of higher education that is applicable to the institution.
4. Activities that re inconsistent with a state plan for desegregation of higher education that is applicable to the institution.
5. Activities or services that relate to sectarian instruction or religious worship; and
6. Activities provided by a school or department of divinity. To this section, a "school or department of divinity" means an institution, or a department of an institution, whose program is specifically for the education of students to prepare them to become ministers of religion or to enter upon some other religious vocation, or to prepare them to teach theological subjects.

Definitive UNALLOWABLE Activities (Also, refer EDGAR Parts 74,75, 77, 79, 81, 82, 84-86, and 97-99 and 2 CFR 200, Subpart E: *Cost Principles*)

1. Advertising
2. Public Relations Costs
3. Alcohol
4. Alumni Activity Costs
5. Bad Debts
6. Local Civil Defense Project Costs not on Institution's Premises
7. Commencement and Convocation Costs
8. Institution Furnished Automobile Costs for Personal Use
9. Contingency Provision Costs
10. Defense and Prosecution of Criminal and Civil Proceedings, Claims, Appeals and Patent Infringement Costs
11. Depreciation Reserves Costs
12. Donations or Contributions
13. Entertainment Costs (include amusement, diversion and social activities)
14. Executive Lobbying Costs
15. Fines and Penalties (including late fees)
16. Goods and Services for Personal Use
17. Housing and Personal Living Costs
18. Insurance Costs to Protect Against Defects in Institution's Materials or Workmanship
19. Interest, Fund-Raising and Investment Management Costs
20. Lobbying Costs
21. Losses on Other Sponsored Agreements

² Part 608-Strengthening Historically Black Colleges and Universities (HBCU) Program

³ No award under this part may be used for telecommunications technology equipment, facilities or services, if such equipment, facilities or services are available pursuant to 396(k) of the Communications Act of 1934. (Authority: 20 U.S.C. 1062, 1063a, and 1069c)

UNALLOWABLE Activities (cont.)

- 22. Membership Costs in Civic Clubs, Community Organizations, Country Clubs, Social or Dining Clubs or Organizations
- 23. Pre-agreement Costs Prior to Effective Date of Agreement
- 24. Recruiting Costs for Help-Wanted Advertising
- 25. Selling and Marketing Costs of Products or Services of the Institution
- 26. Severance Costs in Excess of Institution’s Normal Severance Pay
- 27. Specialized Service Facilities Charges in an amount more than Aggregate Costs of Service over a Long-Term Period
- 28. Student Activity Costs
- 29. Airfare Travel Costs in Excess of Lowest Available Commercial Discount Airfare or Customary Standard Coach Airfare

Title III Part B Activities and Directors

Activity	Activity Director	Contact Info.
Title III Program Administration	Ms. Bri’Anna Baber	bbaber@fisk.edu
Improving Learning Resource Center	Dr. Brandon Owens	bowens@fisk.edu
Enhancing Global Initiatives	Mr. Diedra Gobin	dgobin@fisk.edu
Academic Excellence & Student Performance	Dr. Jonas Tellis	jtellis@fisk.edu
Strengthening Career Services	Mrs. Latreace Wells	lwells@fisk.edu
Effective Advancement and Assessment	Dr. Jens Frederiksen	jfrederiksen@fisk.edu
Improving Fiscal Stability	Mr. Norman Jones	njones@fisk.edu
Enhancing Academic Facilities	Mr. David Cobb	dcobb@fisk.edu
Ensuring Compliance/ Human Resources	Ms. Carol Cooper	ccooper@fisk.edu
Modernizing Information Technology Infrastructure	Mr. Brian Garner	bgarner@fisk.edu
Faculty and Staff Development Innovation	Dr. John Jones	jjones@fisk.edu
Revitalizing the W.E.B. DuBois Honors Program	Dr. LaTanya Rogers	lrogers@fisk.edu
Building Veterans Program Infrastructure	Ms. Shir-earn Rainey	srainey@fisk.edu

Title III Part F Activity and Director

Distance Learning and Faculty Development	Dr. Shirley Brown	sbrown@fisk.edu
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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 programs. The Director is responsible for monitoring the completion of objectives and outcome measures for all activities; critical information needed to facilitate the timely completion of the *Annual Performance Report (APR)* for both Title III Programs. Additionally, the Director manages and approves expenditures of all federal funds allocated for each activity in both Title III Programs. Fisk University is a government subcontractor and is bound by federal rules and regulations. Compliance with these guidelines is a necessary condition for the University's continued participation in the Title III programs. Specifically, the Director is responsible for:

1. Keeping the President apprised of the status of all Title III activities by working in close cooperation with Activity Directors and other University personnel.
2. Providing overall leadership to the programmatic aspects of Title III.
3. Submitting the *Annual Performance Reports*, all budget revisions, any carry-over requests, "no cost extensions," and/or notification of changes in key personnel when required.
4. Coordinating internal and external evaluations to assess program impact on all programs.
5. Disseminating Title III program information internally and externally.
6. Ensuring that the implementation process of Title III activities is consistent with the U.S. Department of Education guidelines and recommendations, as well as Fisk University's policies, procedures, protocols, and in keeping with its organizational structure.
7. Monitoring and approving all grant expenditures.
8. Assisting in the development of University-wide continuation or new applications, reports, and other documents related to the administration of Title III programs.
9. Cooperating with the Business Office to ensure that an efficient and effective system for internal controls, consistent with applicable accounting methods is maintained; and
10. Facilitating the conduct of an annual external evaluation of the effectiveness of activities supported with both Title III Part B and Part F funds.
11. 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 which includes: (a) the implementation plan submitted to the ED Department; (b) facilitating accomplishment of each activity objective; (c) maintaining documentation as evidence of substantive outcomes; (d) adhering to the approved activity budget; (e) submitting the quarterly progress reports on time, and (g) notifying the Title III Director of any slippage in achieving activity objectives and/or changes in key personnel. Each Activity Director reports to the appropriate administrator within the existing organizational structure of the University. Specifically, the Activity Director is responsible for:

1. Preparing and submitting complete and accurate progress reports of activity progress toward objectives to the Title III Office each quarter.
2. Monitoring and reporting on the timely completion of activity objectives.
3. Requesting Title III funds via requisitions in accordance with approved activity budgets and University policies.
4. Approving travel requests.
5. Reviewing and signing monthly Time and Effort Reports. All Title III personnel must submit a Time and Effort Report monthly.
6. Monitoring activity progress in relation to expenditures.

PERSONNEL POLICIES AND RELATED REQUIREMENTS

Activity Directors are required to identify salaried and hourly employee positions to ensure adherence with all university guidelines. As a result, the Activity Directors are responsible for accounting for work completed if an employee is paid in whole or in part by federal funds under the Title III (HBCU and Part F) grants. In addition to all other required approvals, Activity Directors must submit personnel requisitions to the Title III Programs Office for approval. Each employee whose salary is paid, in whole or in part, with federal funds under the Title III (HBCU and Part F) grants, is subject to the human resources policy articulated in the Fisk University *Human Resources Policy Manual*.

Each employee, whose salary is paid in whole or in part by federal funds under the Title III (HBCU and Part F) grants, must also submit a completed Time and Effort Report monthly. This is a federal compliance requirement, and it is to be certified by the supervisor of the employee and/or the Activity Director. Time and Effort Reports shall be submitted to the Title III Office by the fifth (5th) day of each month and should comply with the level of Title III (HBCU and Part F) salary support, i.e., percent of time specified in the approved activity budget. In no event will charges to the Title III (HBCU and Part F) grants – irrespective of the basis of computation – exceed the proportionate share of the base salary for that period.

Funds provided to the University through the Title III (HBCU and Part F) grants may not support any service, program or position that was supported by University resources prior to receipt of the Title III (HBCU and Part F) awards. Consequently, personnel paid by University funds cannot be moved to Title III (HBCU and Part F) grants for performance of the same duties and responsibilities that previously were funded by the University. This safeguards against violating the federal regulation referred to as “supplanting.”

TITLE III/UNIVERSITY REQUIREMENTS

1. Approved Budget for each Fiscal Year
2. Final Performance Report for each Fiscal year
3. OE Report ED Forms 851 and 852
4. Approved Job Descriptions
5. Monthly Time and Effort Report
6. Travel Reports
7. Consultant Services
8. Requisitions for Purchases
9. Evaluations (Internal and External)
10. Performance Progress Report
11. Annual Inventory of Equipment
12. Budget Change Form
13. Student Employment

EXPLANATIONS ABOUT 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 30th may not be available for the next budget period. Remaining funds at the end of the budget year may be re-allocated and transferred to another activity based on institutional priorities at the time.

2. Grant Performance Report for Each Fiscal Year

The U.S. Department of Education requires a detailed Grant Performance Report for each grant period (from October 1st to September 30th) under a multi-year grant. This report should focus on accomplishments/outcomes for the current budget year; the extent to which objectives were met; how expenditures supported implementation strategies; actual (quantifiable) outcomes; personnel needed to carry out objectives; a description of evaluation measures, if any were utilized, and total expenditures for each activity. This report, also, should identify any (generally unanticipated) slippage in meeting objective(s) and describe how this was managed.

3. ED FORMS 851-851a

These forms are required for inclusion in each Activity Narrative and must be prepared each fiscal year by each activity. ED Form 851--*Activity Objectives and Anticipated Results*--contains the specific objectives and anticipated results to measure success. The *Implementation Strategy/Timetable Form* contains the specific tasks essential to achieve each objective.

4. Approved Position Descriptions

Each individual employed under Title III should have a copy of an approved position description on file in the Title III Director's Office. The position description should be followed very closely as it is one of the source documents for the required Time and Effort Reports (previously described on page 13.) Federal funds awarded under the Title III grant shall be used to supplement (increase the level of institutional funds), and in no case supplant (replace) institutional funds, i.e., moving regularly performed duties of individuals or costs to activity budgets.

5. Monthly Time and Effort Report

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

- a. If Time and Effort Reports are not received in the Title III Office by 5:00 pm on the 5th 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 approved activity narrative.

6. Travel

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

- a. Travel request(s) and approval(s) will be in accordance with University Policy.
- b. Travel reimbursement documents should be submitted within fourteen (14) days after return from travel.
- c. 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.
- d. 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 were used to benefit the unit or university should be submitted when completed.
- e. Travel under the Title III activity will be in accordance with the approved operational plan of the Title III Proposal.
- f. Travel provided within the continental United States (the 48 contiguous states; excluding Alaska and Hawaii). Support will not be provided for international travel unless written prior approval is received from the assigned ED Department Program Officer. The Title III Office should be consulted and will facilitate the submission of this request.

7. Consultant Services Request

- a. Responsibility for contracting the services of consultants shall rest primarily with the Title III Director and the respective Activity Director.
- b. All requests for consultants must be filed on a Request for Consultant Services Form at least two weeks in advance of the time service is to be rendered.
- c. No consultant will be paid if prior approval from the appropriate sources as indicated on the appropriate form was not obtained.
- d. The Activity Director for the respective project must file the Consultant Report Form with the Title III Office within seven days after the consultant services have been rendered

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

- The consultant must qualify as an independent contractor.
- Consultant fees from federal funds may not be paid to a full-time employee of the federal government.
- Services to be provided are essential. These generally are referred to as “specialized services” which, typically are not currently available at the institution. In addition, consultant services, paid with Title III funds, cannot be provided by persons receiving salary support under the activity to be assisted.

8. Requisitions for Purchase

All requests must be prepared in accordance with University regulations and submitted to the immediate supervisor for signature of approval. The Purchase Requisition Justification must be submitted for final approval prior to the issuance of the purchase order to the Business Office. The purchasing of supplies, services, and equipment must conform to those items listed in the Title III budget notes for the respective activity.

9. External Evaluations

The Title III Director will schedule an annual internal and external evaluation which will consist of a program and a fiscal audit. The external performance evaluation will involve all Title III activities. A second external assessment will be the responsibility of the Business Office to arrange for the conduct of an annual fiscal audit; the outcomes of which, with the help of each Activity Director, should certify that Fisk University has complied with all applicable laws and regulations.

10. Performance Progress Report

If an Activity Director is delinquent on the submission of quarterly reports through March 30th and/or through September 30th of each year, then a *Mid-Year Progress Report* describing activity accomplishments for the previous six months and/or the year, if applicable. The Mid-Year/Year-End Progress Report is due by March 30th and, if applicable, also by September 30th of each year. These reports facilitate completion of the required *Annual Performance Report* and the conduct of an annual external evaluation.

11. Annual Inventory of Equipment

Each Activity Director is responsible for the inventory of equipment purchased with grant funds. 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.

12. Budget Change Form

All budget changes should be discussed with the Title III Office to ascertain allowability. If it's determined that specific costs are allowable, then the Activity Director will complete a Budget Change Form which is to be approved by his/her immediate supervisor before submission to the Title III Office.

13. 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, document students' work hours accurately, and closely monitor the availability of total funds for student wages. Compliance with these measures ensure compliance with Department of Education and University regulations regarding student employment.

Student Employment (cont.)

The Title III student employment process requires coordination with 1) Title III Administrative Office, 2) Office of Human Resources, and with 3) Payroll. The decision to employ a student worker under Title III Programs rests solely with the Activity Director and the Title III Director and the costs must be reflected in the approved activity, or a revised, budget. The following conditions apply to all student workers supported with Title III funds:

1. Student workers normally work during regular University operating hours unless otherwise approved.
2. 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.
3. Student work assignments should be tied to the specific funded Activity or the day to-day operation of the unit directly supporting the activity.
4. During the fall, spring and summer semesters, students may work up to twenty (20) hours a week.
5. Students must be enrolled as full-time students during the Fall and Spring semesters and enrolled for at least 3 credit hours during the Summer term.
6. Students may not under any circumstances work in more than one Title III funded position.
7. Student will sign and submit a Time & Effort Report at the conclusion of each pay period to supervisor for approval and signature by the 5th day of the month following each pay period

FISCAL CONTROL OF TITLE III FUNDS

Fisk 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. As such, the internal controls established by the Business Office provide a reasonable assurance that Fisk University has complied with generally acceptable accounting standards and applicable Federal laws and regulations. This facilitates a complete accounting of all federal and University time and resources which directly support and/or impact funded activities.

Fiscal Policies and Regulations

1. A copy of each activity budget shall be transmitted from Financial Services to each Activity Director after the Grant Award Notice (GAN) has been received by the Title III Director (who is responsible for ensuring that the Business Office receives a copy of the GAN and all the activity budgets)
2. The University reserves the right to freeze Title III funds in cases where funds are misused or abused and/or where enough evidence exists that programmatic activities are not in compliance with the approved Comprehensive Development Plan (CDP).
3. The ultimate authority for the use of funds, not expended at the end of the current budget period, must be approved for carry-over through the Title III Office to the U.S. Department of Education.

These requests must be received by the Title III Director at least 60 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 ensure that budget revisions are primarily allowable. If these exceed 25% of the Title III budget, the Title III Director must forward the request for approval by the U.S. Department of Education's Program Officer. All other revisions are discussed with the ED Department Program Officer and a copy submitted as an information item. Generally, these should occur during the first nine months, or first three quarter of the grant year (as the re-allocation of funds would be needed for implementation before the expiration date of current grant budget period).

Budget and/or Programmatic Revisions Requiring Prior Approval

- Transferring amounts previously budgeted for student support;
- Adding a new budget category that is not included in the approved budget or adding items to existing categories;
- Purchasing equipment that is not included in the approved budget. The Activity Director is encouraged to consult with the Title III Director and to provide the following information: the brand name, model, cost of each item, and a description of how the requested equipment will advance the activity objective, or ensure its accomplishment);
- Revising the project objectives or scope of activity;
- Changing key personnel, and
- 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. A Purchase Requisition Justification must be submitted to Title III Director
3. All requisitions using Title III funds must be approved by the Activity Director, the immediate supervisor, and the Title III Director in order to be submitted into Great Plains. Although the following are not submitted via Great Plains, prior approval is still necessary: Regency Orders, Amazon Orders, Gift Card Orders, Staples Orders, American Express Reconciliations, Travel Reconciliations, Travel Advances, Travel Reimbursements, and Purchases to be made via credit card.

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 and 2 CFR. Section 200, Section E (the Uniform Grant Guidance) as these delineate allowable and unallowable costs,

4. An authorized representative of the Office of Information Technology Services must review and sign off on all computer purchases; after which the requisition with all relevant documentation (including quotes/bids, and appropriate signatures as established by the University should be followed.)

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

Hiring Procedures

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

Time Reporting and Record Keeping

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

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

Procurement Procedures and Policies

The purchase of goods and services is governed by the policies established by Fisk University Purchasing Department and outlined in the *Fisk University Business and Financial Policies and Procedures Manual*. Procurement that is pursued in a manner that is inconsistent with these policies will be disallowed by the Title III Director.

All Professional Service Agreements, Travel Authorizations, Interdepartmental Service Requisitions, Purchase Requisitions, Check Requisitions or other expenditure forms are initiated by key personnel of the activity making the request and must be supported by appropriate documentation (i.e. invoice, *pro forma* invoice, quote). All requisitions for equipment shall include: a full description of the items being purchased; the intended purpose of the equipment and the location where the equipment will be housed. The Activity Director is required to provide his or her signature on the respective document.

Requests for purchases are then routed to Title III Office for review by the Title III Director, who will review expenditure(s) for approval according to the federal regulations and legislative allowable activities, and will ensure that the required documentation is attached prior to approving the purchase of all goods and services utilizing Title III funds. Note: All expenditures supported with Title III funds must receive prior approval by the Title III Director before any funds are disbursed. Failure to receive prior Title III approval may void the purchase of the goods and services. Upon review, if modifications are not required, the expenditure is forwarded through the Business and Administration Division for processing. If modifications are required, the document is returned to the originator for corrections.

The Title III Director and Activity Directors shall not contract with or provide sub-awards to parties that are debarred, suspended, or otherwise excluded from or ineligible for participation in Federal Assistance Programs or activities. A listing of such parties maybe found at <https://www.epls.gov/>.

The Title III Director, in collaboration with each Activity Director, is responsible for ensuring that costs charged to an activity funded by the Title III award are consistent with the Fisk University's system of internal controls and that no one person has complete control over all aspects of any financial transaction.

Travel and Faculty PD Justification

Travel authorizations and the Travel or Faculty PD Justification must be submitted to the Title III Office for approval of all travel or registration that utilizes Title III funding. All travel authorizations must be received in advance of proposed travel dates. Paperwork for travel that has already occurred will not be processed. Travel authorizations should reflect only the dates spent on official travel and should exclude any personal time that may be used on the trip. Persons traveling on Title III funds are entitled to the following costs in advance:

- Cost of airfare; the cost of the ticket should reflect the cost of the travel on the authorized dates. The traveler is responsible for any increase that results from the addition of personal time to a trip.
- Cost of projected ground transportation
- GSA Government CONUS Rate (or Meal Allowance and Per Diem Rates (<http://gsa.gov>))
- Registration fees
- Cost of Lodging
- Cost of Automobile Mileage (<http://www.mapquest.com/>)

Consultant

The Professional Services Agreement Form (PSA) in and the Title III Model contract shall be utilized in the hiring of any consultant to perform work that is funded in whole or in part by funds made available through the Title III Program.

Activity Directors may not hire consultants to perform tasks included in the approved Title III work program unless there is a need in the project for the services of that consultant: and the

Activity Director cannot meet that need by using an employee rather than a consultant. In procuring the services of a consultant, Activity Directors are directed to comply with the requirements for competition as stipulated in the *Fisk University Business and Financial Policies and Procedures Manual*. An Activity Director shall not avoid the competition requirements of the Fisk University Business & Financial Policies & Procedures Manual by submitting piecemeal agreements with the same consultant for the same or related project. Employees of Fisk University may not be paid a consultant's fee except in unusual circumstances, and only if the work performed by the consultant is in addition to his or her regular departmental load and the consultation fee is across departmental lines or the consultation involves a separate or remote operation. Upon presentation of appropriate itemized receipts or other detailed documentation, consultants may be reimbursed for meals and other expenses incurred during travel.

Program Income

In general, the Title III Office must be advised in writing of all income derived from the expenditure of Title III funds by the Activity Director. Program income includes income from fees for services performed, from the use or rental of real or personal property acquired with Title III funds, and from the sale of commodities or items fabricated under an approved project. Program income does not include interest on grant funds, rebates, credits, discounts, refunds, etc. and interest earned on any of them. In consultation with the Title III and Business Offices, program income may be used in one of the following ways:

- Added to funds committed to the project by the U. S. Department of Education and used to further eligible project or program objectives;
- To finance the non-federal share of the project or program; or
- Deducted from the total project or program allowable cost in determining the net allowable costs on which the federal share of costs is based.

Food and Meeting Expenses

Food costs are generally considered to be a category of entertainment and are generally unallowable; however, in certain instances, the purchase of food using federal funds may be considered allowable. Any purchase of food is required to be approved in advance by the Title III Director.

Only that food which has been authorized in advance may be purchased. Generally, this would include meals which are an integral and necessary part of a meeting (e.g., working meals where business is transacted).

In making a request to obligate Title III funds to purchase food, Activity Directors should submit a short narrative which responds to the following questions and concerns:

- (1) How is the meeting integral to achieving the purposes of the grant?
- (2) Is the meeting intramural or extramural?
- (3) Why is it necessary to have food in order to have the meeting? (i.e., Is it in order to maintain continuity of the meeting?). Document the agenda and the beginning and ending times of the meeting. If the meeting is scheduled at mealtime, explain rationale.

- (4) The cost should be reasonable. (They should reflect the “reasonable and prudent person” test.)
- (5) A list of potential participants (invitees) should be attached. After the meeting, a sign-in sheet, documenting the attendees/participants should also be provided. Unless obvious, the relationships of the participants to the project should be noted.

Equipment

The requirements of 34 CFR Part 74 are applicable to the management and disposition of equipment purchased, in whole or in part, with funds made available through the Title III program. The policies and procedures outlined in this section are excerpted from those requirements and meant to provide some guidance to Title III Activity Directors.

- (1) Unless otherwise indicated, title to the equipment purchased with Title III funds rests with Fisk University.
- (2) Equipment acquired with Title III funds shall not be used to provide services to nonfederal outside organizations for a fee that is less than private companies charge for equivalent services, unless specifically authorized by Federal statute, for as long as the Federal Government retains an interest in the equipment.
- (3) Equipment acquired with Title III funds shall be used in the project or program for which it was acquired as long as needed, whether or not the project or program continues to be supported by Title III funds and may not encumber the property without approval of the Secretary. When the usefulness for the original project or program has expired, the Activity Director shall use the equipment in connection with any other federally sponsored activities, in the following order of priority:
 - (a) activities sponsored by the U. S. Department of Education; and then
 - (b) activities sponsored by other Federal awarding agencies.
- (4) When acquiring replacement equipment, the Activity Director may use the equipment to be replaced as trade-in or may sell the equipment and use proceeds to offset the costs of the replacement equipment subject to the approval of the Secretary.
- (5) The property management standards for equipment purchased with Title III funds includes maintaining records that incorporate:
 - (a) a description of the equipment;
 - (b) manufacturer’s serial number, model number, federal stock number, national stock number or other identification number;
 - (c) source of the equipment, including the award number;
 - (d) identification of whether title vest with the University or the federal government;
 - (e) unit acquisition cost;
 - (f) location and condition of the equipment and the date the information was reported;
 - (g) ultimate disposition information, including the date of disposal and sales price or the method used to determine current fair market value where a recipient compensates the U. S. Department of Education for its share.
- (6) Not less than every two years, the Title III Director and each Activity Director shall conduct a physical inventory of equipment. Any differences between quantities determined by physical inspection and those shown in the accounting records shall be

- investigated to determine the causes of the difference. The Title III Director and the Activity Directors, in conducting the inventory are required to verify the existence, current utilization and continued need for the equipment. Each Activity Director is responsible for maintaining a current inventory listing of project equipment, utilizing the forms provided by the Title III Office.
- (7) such listing shall be provided to the [Fixed Assets Coordinator] after each update, but not less than once each grant year.
 - (8) In addition to the listing of new equipment purchased, changes in condition or location of the equipment shall be considered reasons for updating the inventory listing.
 - (9) Each Activity Director is responsible for ensuring that adequate safeguards are in place to prevent loss, damage, or theft of equipment purchased with Title III funds.
 - (10) If equipment is stolen, the Activity Director shall file a report with the Fisk University Security Department and the Nashville Metro Police Department. Copies of both reports shall be submitted to the Title III Office and the [Fixed Assets Coordinator], along with inventory data (i.e. item description, model, serial number, date of purchase, costs, etc.) that will allow modification of the inventory records.
 - (11) When an approved project no longer needs the equipment, the equipment may be used for other activities in accordance with the following standards:
 - (a) For equipment with a current per unit fair market value of \$5,000 or more, the Activity Director may retain the equipment for other uses provided that compensation is made to the U. S. Department of Education;
 - (b) For equipment with a current market value of less than \$5,000, the University may use the equipment for any purpose.

The Title III Office will provide an inventory report and identification tags to Activity Directors in order to facilitate management of equipment records for each project or activity funded through the Title III Program.

PRE-AWARD PROCEDURES FOR THE TITLE III PROGRAM GRANTS

The President of Fisk University serves as the Principal Investigator of the Title III Grant(s). As such, the President establishes priorities based on the University's Strategic Plan. Prior to the beginning of each of the five-year cycles and during the year, faculty and staff are invited to submit project proposals consistent with the University's Strategic Plan and the overall goals of the Title III Grant(s). The invitation to submit will describe the university priority and deadline for submission to the Title III Office.

Faculty and staff are required to conform to the internal review requirements of the respective departments and units. Proposals submitted to the Title III Office will not be considered if they have not been approved by the Division Chairs or Unit Heads Executive Vice President and Provost, and the Office of Sponsored Research (OSR).

The Title III Director will forward all proposal submissions with internal approvals to the President of Fisk University for review and funding approval. The President of Fisk University will conduct a review based on the consistency of the submittals with the selected priority to determine which projects will be incorporated into the institution's application to the U. S. Department of Education. The Title III Director will notify the activity directors for each of the selected projects, to invite them to modify proposals for consideration by the U.S. Department of Education. Additional instructions and technical assistance will be provided by the Title III Director who may consult with the College's Office of Sponsored Research. Project proposals may not be accepted for consideration after the established deadline.

Proposal Format

Model proposals, illustrating the proposal format(s) and the required forms are available from the Office of Sponsored Research. The project proposals must contain the following:

- Title Page
- Introduction
- Project or Program Description
- Description of the Project Objectives and Anticipated Results
- Individual Narrative Form
- Implementation Strategy and Timetable Form
- Quantitative Description of the Baseline Conditions to be Improved or Addressed by the Project
- Listing of the Specific Tasks to be Completed
- Detailed Individual Activity Budget
- A description of proposed evaluation strategies; how assessment of the effectiveness of the proposed activity/project will be determined.

Draft proposals may be submitted to the Title III Office no later than ten (10) working days prior to the deadline to enable review, revision and preparation of the complete proposal application for Fisk University to ensure the attainment of the deadline established by the U. S. Department of Education.

POST-AWARD PROCEDURES AND POLICIES

Upon the receipt of the Grant Award Notification (GAN) from the U. S. Department of Education, the Title III Director will notify all Activity Directors identifying the grant amount, and a list of required documents needed in the Title III Office, such as the following: Fisk University Budget Contract (active for one year), Personnel Action Request Forms (active for one grant year) and activity modifications (if applicable). The Title III Director will also request account numbers for each activity from the Grants Accountant in the Business and Finance Department. Upon the completion of all necessary documents, a unique restricted grant account number will be assigned for each activity. The Activity Director will be required to attend the annual Title III Start-Up Meeting (an orientation workshop) prior to receiving authorization to use grant funds. During this workshop, the Activity Director will receive directives for grant management, required reports, an approved budget authorized by the President and signed by The Office of Title III Programs.

At the commencement of the grant year, (which is concurrent to the fiscal year), the Office of Title III Programs will provide Activity Directors with trainings regarding Title III project management. The OSR Director will provide Activity Directors with report forms and will arrange for trainings with appropriate departments relative to budgetary principles and programmatic management to ensure all Activity Directors and staff can track progress, monitoring expenditures and compiling data for reports.