



TITLE III

Strengthening Historically Black Colleges & Universities

POLICIES AND PROCEDURES HANDBOOK 2017-2022

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FORWARD

Huston-Tillotson is the recipient of two federal grants managed by the Title III office. They include the Title III HBCU Program and the Mandated/FUTURE Act (formerly SAFRA/ Student Aid and Fiscal Responsibility Act of 2009).

The Title III Policies and Procedures Handbook is prepared to facilitate University personnel in the implementation of activities funded by the Title III/FUTURE Act grant awarded to Huston-Tillotson University. It is your responsibility as an employee to read this handbook prepared. This Handbook serves as a general guide in carrying out the approved Plan of Operation.

Compliance with the guidelines and regulations will ensure funds are administered effectively according to the goals of the Title III, Part B of the 1965 Higher Education Act, the U.S. State Department of Education General Administrative Regulations (EDGAR), and other Federal directives, and affirms that Huston-Tillotson University has achieved anticipated results approved by the United States Department of Education.

This Handbook will be updated as changes in policies are made by the U.S. Department of Education and/or Huston-Tillotson University. While the handbook is comprehensive, it should not be considered inclusive of current regulations and policies. The University has the right to change, modify, or add policies and procedures according to changes in federal program regulations. This Policies and Procedures Handbook is effective until replaced by an updated version or revised insertions.

INTRODUCTION

Purpose

The goal of the Strengthening Historically Black Colleges and Universities Act: Title III, Part B is to assist institutions like Huston-Tillotson University fund developmental activities that will help the University better fulfill its mission. Administered by U.S. Department of Education's Institutional Development and Undergraduate Education Service (IDUES), the Title III, Part B program supports improvements in educational quality, management and financial stability at qualifying postsecondary institutions. Funding is focused on institutions that enroll large proportions of minority and financially disadvantaged students with low per-student expenditures. The program provides financial assistance to help institutions solve problems that threaten their ability to progress, to improve their management and fiscal operations, and to build endowments. It is Huston-Tillotson's responsibility to plan, implement and evaluate activities that indeed strengthen the institution and can therefore become institutionalized as part of its overall functions. The University's contract with the U.S. Department of Education is to manage the funds and report the results.

Title III funds may be used for:

1. Purchase, rental, or lease of scientific or laboratory equipment for educational purposes; including instructional and research purpose;
2. Construction, maintenance, renovation, and improvement in classroom, library, laboratory, 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 their field 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 programs materials;
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;
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 the financial literacy and economic literacy of students or the students' families, especially with regard to student indebtedness and student assistance programs;
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; and
16. Other activities that carry out the purposes of the Title III legislation and are approved by the Secretary of the Department of Education.

Applicable Regulations

Federal Law (**EDGAR***) requirements and Federal auditing practices (OMB Circulars) may conflict with current University policies and practices. **In all cases**, Federal law will supersede policies and practices of Huston-Tillotson University.

The following regulations apply to those projects funded in whole or in part by the Title III program:

- 1) The Department of Education General Administrative Regulations (EDGAR) as follows:
 - a) Code of Federal Regulations (CFR): 34 CFR part **74** (Administration of Grants to Institutions of Higher Education, Hospitals, and Nonprofit Organizations).
 - b) 34 CFR part **77** (Definitions that Apply to Department Regulations).
 - c) 34 CFR part **79** (Intergovernmental Review of Department of Education Programs and Activities).
 - d) 34 CFR part **82** (New Restrictions on Lobbying).

- e) 34 CFR part **85** (Government-wide Debarment and Suspension Nonprocurement) and (Government-wide Requirements for Drug-Free Workplace (Grants)).
 - f) 34 CFR part **86** (Drug-Free Schools and Campuses).
- 2) The regulations in CFR part **608** (Strengthening Historically Black Colleges and Universities Program).

EDGAR Link:

Other Limitations

A grantee shall not use more than fifty percent (50%) of its grant for constructing or maintaining a classroom, laboratory or other instructional facility.

Funds awarded under the Title III Program must be used to **Supplement** and to extent practical, increase funds that would otherwise be made available for the purpose listed in 608.10 and 609 of the program regulations and in no case **Supplant** those funds.

- **Supplement** is defined as using grant funds to correct a deficiency in an existing activity or service, or to improve, enrich, or enhance an existing service or activity through the addition of new services or activities.
- **Supplant** is defined as substituting grant funds to pay for personnel, activities, services, or other cost that ***were supported from other sources prior to the receipt of a grant*** or such costs that are contained in the current institutional budget.

Supplanting - Supplemental Requirements

Title III grant funds may not support any service, program, or position that was supported by University resources prior to awarding of the Title III grant.

The following procedures will insure that Title III funds are used to supplement not supplant institutional funds:

University Funded Positions	Title III Funded Positions Requirements
<ul style="list-style-type: none"> • University continues to fund the position • No Title III funds are used • Position is University contribution to Title III Program 	<ul style="list-style-type: none"> • Personnel paid by the University cannot be moved to Title III funding for performing the same duties that were University funded.

Relationship to University Mission

Mission Statement

Located in Austin, TX, Huston-Tillotson University nurtures a legacy of leadership and excellence in education, connecting knowledge, power, passion, and values. Huston-Tillotson is affiliated with the United Methodist Church, the United Church of Christ, and the Negro College Fund (UNCF).

Huston-Tillotson awards undergraduates, four year degrees in business, education, the humanities, natural sciences, social sciences, science and technology.

The University also endeavors to provide additional programs that are vital and unique to the needs of the population it serves. HTU emphasizes the study and applications of technology, basic and applied research, service learning, health and wellness, and economic and cultural affairs. The University expands its emphasis to incorporate an international focus on governmental, economic and cultural affairs. Out of this concept, the Delta Research and Cultural Institute provides the avenue for faculty and students to engage in theoretical and applied research on subject matter related to the cultural, social, economic and political concerns of the Delta.

The University's priority is to plan, implement and evaluate activities that support the mission, purposes and goals of the University. Each activity is governed by a set of objectives, and each objective is related specifically to one or more of the Institution's long-range goals. In order to ensure its continued success and the implementation of all planned activities, Title III Program Administration will:

- Recommend policies and develop procedures to ensure adherence to Federal regulations that provide a clear audit trail;
- Provide support services to facilitate maximum implementation of funded activities;
- Recommend policies and procedures to facilitate Title III proposal development and submission;
- Recommend changes to Activities which will enhance the program in line with expected goals and objectives.

Using This Handbook

This Policies and Procedures Handbook is designed to provide guidance and compliance directives in carrying out the objectives of the Title III Part B and FUTURE Act. Strengthening Historically Black Colleges and Universities grant at Huston-Tillotson University.

Administrative procedures for the Title III funded activities follow the approved policies and practices of Huston-Tillotson University; however, Federal Law (EDGAR) requirements and Federal auditing practices (OMB Circulars) may conflict with current University policies and practices. In all cases, Federal law will supersede policies and practices of Huston-Tillotson University. This Handbook will be updated annually; however, periodic updates may be required to ensure that the University's policies and procedures reflect applicable Federal guidelines and practices.

In support of our compliance efforts, this Handbook provides assistance to Activity Directors/Coordinators and other key personnel in carrying out the objectives and implementation strategy of the approved Plan of Operation. It is to be used as a guide for ensuring adherence to all guidelines and regulations listed.

The Title III Director is responsible for monitoring the completion of activity objectives and tasks, and the evaluation of projects according to the approved Plan of Operation. Additionally, the Title III Director is responsible for ensuring compliance with Federal expenditure guidelines. The University's contract with the Department of Education requires adherence to Federal rules and regulations. Continued funding of the Title III program requires full compliance with applicable regulations.

As grant requirements change, revisions or additions to this Handbook will be necessary to ensure compliance. All Activity Directors/Coordinators **must** become familiar with the grant requirements included herein, keep up-to-date on all administrative procedures and ensure that policies and procedures are followed carefully. All persons using Title III funds should refer to this Handbook before charging any expenditures. Questions concerning Title III matters should be directed to the Title III Staff. The Staff of the Title III Office will provide program guidance and support.

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TITLE III ADMINISTRATIVE STRUCTURE

At Huston- Tillotson University, the Project Director is the Principal Investigator for the Title III program. Within Federal and Title III program guidelines, the President determines which projects will be supported with Huston-Tillotson University Title authorization, assists in designating Activity Directors/Coordinators, and plays a primary decision-making role with regard to Title III funds. Overall leadership responsibility for HTU Title III Programs is vested in the position of the Director.

Administrative Office Staff

Director: The Director of Title III is responsible for the overall implementation of the policies and procedures of the program and for ensuring conformance with all applicable Federal and University regulations. The Director ensures that the President's vision and priorities are

reflected in all activities approved for funding, and serves as the President's official agent on all Title III matters.

The Director has the following responsibilities:

- Act as a liaison between the US Department of Education and Huston-Tillotson University
- Ensure that the implementation process for Title III activities is consistent with the regulations governing Title III as well as with University policies, procedures, and line/staff relationships.
- Facilitate the establishment of effective lines of communication to ensure that the Title III project operation is consistent with the goals of overall institutional development, institutional self-sufficiency, and grant objectives.
- Provide leadership for integrating all activities in the project with all other University staff and University operations.
- Approve all grant expenditures and maintain adequate authorization and audit trail records for all such expenditures.
- Work in collaboration with the Business Office to ensure that an efficient system for fiscal controls and routine reporting of Title III funds is maintained.
- Communicate with the Title III Grant Program Officer in Washington, DC on the projected amount of funds remaining in a grant period.
- Report progress on activities including successes, and problems to the President.
- Refine or revise objectives of the Title III Activities as necessary and seek authorization from the US Department of Education for implementation changes.
- Hold regularly scheduled Title III staff meetings to assist Activity Directors/Coordinators in solving problems with achieving objectives, keep them informed of policy changes, and share with the public the success of projects.
- Use reports to monitor progress toward objectives and University involvement and institutional impact of each activity.
- Integrate the Title III objectives and activities into the University's strategic planning process.
- Represent Huston-Tillotson University at conferences and technical assistance workshops related directly to Title III activities.

Post-Award Specialist: The Post-Award Specialist is responsible for assisting with the daily management of the Title III program. The Post-Award Specialist is charged with ensuring that Activity Directors/Coordinators comply with all applicable policies and procedures, the accomplishment of program objectives, and timely and appropriate expenditure of Title III funds. The Post-Award Specialist serves as a liaison for Activity Directors regarding individual Activity budget issues and assist the Director in preparing the institution's annual Title III budget request. The Post-Award Specialist will also be responsible for tracking and monitoring all Activity budget requests and expenditures to ensure compliance with applicable Federal and University fiscal policies. The Post-Award Specialist will collect and analyze financial data; and assist in processing of budget revisions.

Administrative Assistant

The administrative Assistant provides administrative support for the Title III Office by updating and maintaining records, administering purchases for the unit, assisting with special projects and reporting, website management, designing newsletters, scheduling meetings, and performing general clerical duties.

Activity Directors/Coordinators

Activity Directors/Coordinators are responsible for carrying out the approved program plan of operation contained in the funded Title III Proposal and for achieving the identified objectives in their respective activities. Only Activity Directors/Coordinators may initiate requests for use of funds and their requests must be based upon the approved budget.

Activity Directors/Coordinators have the following responsibilities:

- Day-to-day management of their respective activity and attend on-campus Title III meetings.
- Prepare complete and accurate reports of Activity progress for submission to the Title III Director's Office in a timely manner (i.e., quarterly activity progress reports; annual performance reports*; related travel reports; time and effort reports and equipment inventories).
- Monitor and report the timely completion of assigned Activity tasks and milestones.
- Request Title III funds in accordance with approved Activity allocations and University procedures.
- Approval and "sign-off" authority on **ALL** Title III activity expenditures.
- Develop strategies for the completion of objectives in a timely manner.
- Monitor Activity budgets, and 'sign-off' on **ALL** approved budget expenditures.
- Provide Title III Director with a copy of an Appointment Form on each person hired and/or terminated, who receives salaries under Title III.
- Assisting the Title III Director with preparation of revised budgets and activity proposals for subsequent years funding.
- Perform other duties, which may be necessary to ensure that objectives of the Activity are achieved.

Activity Directors/Coordinators will receive a performance evaluation annually based on 1) attendance at meetings; 2) timely submission of reports; 3) efficient expenditure of Title III funds; and 4) meeting program objectives. This evaluation will be used to support future funding allocations under the Title III Program.

(*Annual Performance Reports that reflect the impact that the Title III activity has had on the entire operational aspect of the University are to be prepared and submitted to the Title III office by October 31st of each calendar year.)

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ADMINISTRATIVE AND OPERATIONAL POLICIES

Administrative Policies

All governing policies and procedures of the University are applicable to Title III personnel and activities.

No commitments, which require the use of the Title III funds, which are not specifically included in the approved Title III grant plan of operation shall be made. Questions concerning this should be directed to the Title III Office and clarity sought prior to making such commitments.

All requests involving expenditures from Title III budgets must be forwarded to the Title III Office 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 Title III Office in sufficient time (5 working days) to allow for clearance prior to processing. All Title III charges must be made to the appropriate line item.** Funds designated for one line item may not be used for another line item, unless appropriate budget revisions are requested and approvals granted by Title III Administration.

The University is required to spend Title III funds in a manner consistent with the provisions of the final approved operating plan. If modifications are necessary to the objectives and milestones 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 Director.

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.

Operational Policies & Procedures

Substantive changes in the scope and/or plan of operation of any Title III Activity **must be approved by the Department of Education in writing prior to implementation.** Requests for modification of any programmatic objective must be made through the Title III Director. If approved by the President, modifications will be included in our annual report submission to the Department of Education. Only after approval is received from the Department of Education can changes be effected. The Department of Education defines substantive changes to an institution's program as those changes which redirect the objectives and scope of an activity, changes in key personnel, international travel, and continuation of the project for more than three months without the direction of a Project Director.

Personnel

Personnel are to be hired in a nondiscriminatory manner according to the provisions stated in Huston-Tillotson University's Personnel Handbook. This category includes all full-time, part-time, and temporary employees who are supported by Title III funds. The Title III Director must be consulted to ensure that the hiring of persons for Title III activities is within the framework of the approved Plan of Operation and to ensure that appropriate funds are available to accommodate the action. **Title III funds may not be used to supplant the use of University funds in the hiring process.**

The following actions must be completed for all persons being paid with Title III funds:

- Prior to any announcement, interview or filling of a vacant position, departments having vacant positions must prepare and submit to the Title III Office, Request for Appointment form for faculty or staff. Forms are to be completed and properly signed. If approved, the Title III Office will submit the forms to the Business Office and then to the Office of Human Resources for execution.
- A Change of Status Form (for internal transfer) must be initiated for any position that will be funded by Title III. The requisition will be initiated by the Activity Director/Coordinator and routed to the appropriate department head and/or Vice President for initial approval. Once approved, these should be routed to the Title III Director for processing. Please allow ten (10) working days for processing by the Title III Office and Human Resources.
- The Title III Director will coordinate this approval process to determine the sources of funding used for the position.
- Personnel funded by Title III should not be hired or terminated without notifying Title III Administration. It is the responsibility of the Activity Directors/Coordinators to ensure these actions are routed through the Title III Office.
- It should be noted that the University is not obligated to offer appointed personnel the budgeted salary amount. Salaries are based on equity, expected duties and responsibilities, experience and qualifications needed to perform the assigned duties in a particular position.
- **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 funds, as allowed by University policy. Benefits are available to regular employees who work a normal schedule of at least 20 hours per week or 80 hours per month. For more information concerning benefits, please contact the Department of Human Resources.

Student Employment

Student employment under Title III-funded activities is an appropriate and beneficial use of 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-added experiences for the students. Activity Directors/Coordinators are also expected to budget and closely monitor the expenditure of student wages. This should include ensuring that funds are available and adhere to all Department of Education and University regulations regarding student employment.

The Title III student employment process requires coordination with 1) Title III Office, 2) Office of Business, 3) Office of Human Resources, and 4) Payroll. The decision to employ a particular student worker under Title III Programs rests solely with the Activity Director/Coordinator and the Title III Director. The following conditions apply to all Title III student assistants:

- Student assistants normally work during regular University operating hours unless otherwise approved.
- **STUDENT ASSISTANTS WILL NOT BE PAID FOR WORKING ON OFFICIAL UNIVERSITY HOLIDAYS. IN NO CASE SHOULD A STUDENT BE PAID FOR HOURS NOT ACTUALLY WORKED.**
- Student work assignments must be tied to the specific funded Activity or the day-to-day operation of the unit directly supporting the Activity.
- During the Fall and Spring semesters, students may work up to twenty (20) hours a week,
- **Students MUST be enrolled in at least 6 credit hours during the fall, spring, and/or summer semesters in an undergraduate program.**
- **Students may not under any circumstances work in more than one Title III-funded position.**

Employment of Non-Citizen Students

NOTE: Federal regulations provide some limitations on the employment of non- U.S. citizens. Refer all questions regarding a non-citizen student's eligibility to work to the Title III Office and/or Office of Human Resources.

Student workers who are non-citizens may be employed using Title III funds under the following conditions:

- Enrolled full-time in a degree-granting program at the University.
- Provide visa documentation of their eligibility to work in this country.
- Abide by any other regulations mandated by the University's Office of Human Resources.

Processing Student Employment Requests

Certain procedures must be carried out prior to hiring student employees funded through Title III Programs:

- Job descriptions are to be developed and posted in the respective Activity's area. Notice of job opportunities should also be displayed in areas frequented by students; all students may apply for these positions. A current job description for each position must be submitted to the Title III Office and kept on file in the Activity Director/Coordinator's office.
- Information on available student employment opportunities must be sent to the Title III Office. This information will be included in the Activity's file and will assist the Title III Office in responding to inquiries regarding employment opportunities.
- Before a student can begin working **and** in order for student wage requests to be processed in a timely manner, the Activity Director/Coordinator must ensure that all of the following forms are completed two weeks (10 working days) prior to the student's start date:
 - ✓ Huston-Tillotson University Part-time/Contractual Employment Packet*
 - ✓ Proper identification

**The packet can be obtained from the Human Resources Department.*

Budget Process

Each Activity Director/Coordinator will be provided with an annual line item budget, access to view expenditures through the HTU shared drive (O:/), and periodic financial status reports. Status reports should be carefully reviewed against the records and documentation maintained by the Activity and any discrepancies noted should be shared with the Title III Director.

Periodic budget analysis should also be conducted by the Activity Directors/Coordinators to ensure that Title III funds are being spent in a timely and efficient manner. The expectation is that annual funds will be utilized in a manner which

ensures that the objectives of the Activity are accomplished. Any deviations or discrepancies should be explained in Quarterly Performance Reports.

Activity budgets must be tied to the approved program Plan of Operation and consistent with the intent of the Department of Education in carrying out the objectives of Title III Programs.

Budget Revisions

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

- The [Budget Transfer Form](#) may be obtained from the Office of Business webpage.
- The form must be returned to the Title III Office with appropriate signatures.
- When the review and approval form is completed by the Title III Director, the Budget Transfer form will be forwarded to the Office of Business.

Activity Directors/Coordinators 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. Each activity is limited to four (4) budget revisions per year.

Budget Transfers Between Activities

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 Director.

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: reasonable, allocable, and allowable
- Must meet other Federal statutes, regulations, and grant conditions

Procurement

The purchase of goods and services is governed by the policies established by Huston-Tillotson University Office of Business. Procurement that is pursued in a manner that is inconsistent with these policies will be disallowed by the Title III Office.

The Activity Director/Coordinator must adequately describe procurement needs. All requests (online and paper) must be typed and include justification based on the activity's goal before it

can be approved by the Title III office. After the request is approved by the Activity Director/Coordinator and/or senior administrator(s), if applicable, it is forwarded to the Title III Office for processing and for signature by the Director. A copy of the approved requisition will be maintained in the Activity file in the Title III Office. The request is then submitted to the Office of Business for processing.

Note:

1. If the item(s) or service requested is not part of the approved budget, a separate amendment to the project budget and justification must accompany the request for approval.
2. When 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.

Purchase Justifications

All purchase/check requisitions require prior approval by the Title III Director and must be justified based on the activity's goal before it can be approved and processed. After listing the item(s) in the DESCRIPTION AND SPECIFICATIONS section, include a Title III justification that identifies the goal and the specific objective for the item(s) being purchased. This will ensure that the purchase is listed as part of the approved budget for the year. In some instances, you may be asked to provide additional justification by the Title III Office and/or the US Department of Education.

All requests for supplies, equipment, services, rentals, subscriptions or any other transactions that involve an expenditure of University and Title III funds require the initiation of a purchase requisition. Requisition for items with an individual cost of \$5,000 or more see the Business Office institutional policy, each quote provided by a different vendor. Requisitions for services in amount exceeding the small purchase threshold (currently fixed at 41 U.S.C. 403 (11) – currently \$25,000) must gather the product specification(s) and other required information and bring them to the Business Office to request that a formal bid be done.

When preparing requisitions for processing, one should include on the form the department (Title III and the name of the activity), the Activity number (if applicable), and the date that the requisition is prepared. When bids or quotes are not required by University policy, the name of a suggested vendor should be indicated on the documents. Solicitation for goods and services must provide all the following:

- A clear and accurate description of the technical requirements for the material product, or service to be procured. In competitive procurements, descriptions shall not contain features, which unduly restrict competition.

- Requirements, which the bidder/vendor must fulfill, and all other factors to be used in evaluating bids or proposals.
- A description, whenever practicable, of technical requirements in terms of functions to be performed or performance required, including the range of acceptable characteristics or minimum acceptable standards.
- The specific features of a brand name or description that bidders are required to provide when these items are included in the solicitation.

In accordance with the Department of Education General Administrative Regulations (EDGAR), recipients of Federal awards, such as Title III, shall take the following steps:

- Ensure that small businesses, minority-owned firms, and women's business enterprises are used to the fullest extent practicable.
- Make information on forthcoming opportunities available and arrange time frames for purchases and contracts to encourage and facilitate participation by small businesses, minority-owned firms, and women's business enterprises.
- Consider in the contract process whether firms competing for larger contracts intend to subcontract with small businesses, minority-owned firms, and women's business enterprises.
- Encourage contracting with consortiums of small businesses, minority-owned firms and women's business enterprises when a contract is too large for one of these firms to handle individually.
- Use the service and assistance, as appropriate, of organizations such as the small Business Administration and the Department of Commerce's Minority Business Development Agency in the solicitation and utilization of small businesses, minority-owned firms and women's business enterprises.
- 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

An authorized representative of the Academic Computer Services/Information Technology Department must sign off on all computer and/or software purchases.

It is incumbent upon the Activity Director/Coordinator to keep an accurate record of all expenditures (purchase requests, reimbursement forms, budget transfers, etc.) for their own information and budget management.

Sole Source Procurement

Sole Source Procurement occurs when only one vendor is known to supply a particular item or service 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 Purchasing Department.

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.”

Equipment

Huston-Tillotson University policy defines equipment as tangible personal property having a useful life or more than one year and an acquisition cost of \$5,000 or more per unit. Personal property means property of any kind except real property-land and buildings.

Each Activity Director should purchase all equipment early in the grant period so that the programmatic equipment is available for implementation of objectives.

The procedures for ordering equipment are as follows:

1. Obtain a quotation from three (3) vendors.
2. Requests for computer and computer software must be approved by the IT Director.
3. Submit purchase order with original quotations attached to the Title III Office.
4. Purchase orders will be forwarded to the Business Office for processing after being approved.

General purpose equipment, such as office equipment and furnishing, heating and cooling units requires prior approval from the US Department of Education. Special purpose equipment costing more than \$5,000 requires advance approval.

The recipient shall use the equipment in the Activity for which it was acquired as long as needed, whether or not the Activity continues to be supported by Title III funding. When no longer needed for the original intent, the Activity Director shall notify the Title III Office for appropriate disposition of the equipment.

Equipment Management Requirements (EDGAR 74.34/80.32)

Procedures for managing equipment (including replacement equipment) until transfer, replacement, or disposition takes place shall, as a minimum, meet the following requirements:

- **Property Records** shall be maintained accurately. Retention and access requirements for these records are explained in Subpart D of the Department of Education General Administrative Regulations (EDGAR). For each item of equipment, the records shall include:
 - A description of the equipment, including the manufacturer's model
 - number, if any:
 - An identification number;
 - Identification of the grant under which the recipient acquired the equipment;
 - The information needed to calculate the Federal share of the equipment;
 - Acquisition date and unit acquisition cost;
 - Location, use, and condition of the equipment and the date the information was reported;
 - All pertinent information of the ultimate transfer, replacement, or disposition of the equipment

A physical inventory of equipment shall be taken annually and the results reconciled with the property records to ascertain the existence, current utilization, and continued need for the equipment. A statistical sampling basis is acceptable. Any differences between quantities determined by the physical inspection and those shown in the accounting records shall be investigated to determine the cause of the differences.

- A control system (including identifying marks) shall be in effect to ensure adequate safeguards to prevent loss, damage, or theft of the equipment. Any loss, damage, or theft of equipment shall be investigated and fully documented.
- Adequate maintenance procedures shall be implemented to keep the equipment in good condition.
- 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. **Personal computers, laptops and other items at the Title III Director's discretion will continue to be inventoried.**

- Where equipment is to be sold, the Federal Government has a right to part or all of the proceeds. Under no circumstances should equipment procured with Title III funds be sold without the written permission of the Title III Director.

Equipment is approved for use in the achievement of goals of each Activity and should be moved only if the Activity is being moved to different quarters at the University, or the equipment is required for use in another department attached to the University. The Title III Administration must be notified prior to the relocation of any equipment and/or furniture items.

Supplies

"Supplies" mean all tangible personal property other than equipment.

- Grantees should purchase supplies from Title III funds only in amounts reasonably expected to be required for the performance of grant activities.
- Supplies should be procured on a timely basis to reflect use of supplies during the period of grant support.
- Although there is no requirement for accountability for supplies similar to that for equipment, the grantee is expected to maintain records that support the purchase, receipt, and proper charging of supplies in accordance with good management practices.

Contracts

Costs associated with payments to cooperating institutions or agencies are defined as contract costs. **Payments to independent consultants are not included under this classification. Independent consultants are to fall under the "Other" category.**

Other Expenses

Direct costs for items, which are not covered in any of the previously mentioned classifications include: training stipends, communications, transportation (freight, parcel post, etc. not covered in vendor purchase price) equipment rental, computer use charges, software, registration fees, summer employment stipends, and consultant fees and expenses. These items will be included in the "Other" section on the budget narrative.

Independent Consulting Services

Consultants may be engaged to assist in Activities only as described in the Activity budget and with prior approval from the Title III Director. Consultants are normally used either as workshop presenters or as experts who provide advice and/or service. Information regarding the need for a consultant must be provided on the Consultant/Participant Request form. Activity

Directors/Coordinators may not hire independent 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 individual; and
- the Activity Director/Coordinator cannot meet that need by using an employee rather than an independent consultant.

After the Consultant/Participant form has been signed by the Title III Director and approved by the President or his/her designee, a Consultant/Participant Report form should be submitted by the Activity Director/Coordinator for payment. An invoice must be provided after services have been submitted to the Title III Office to receive payment.

If the service provided was advice, the scope of this should be carefully documented with a written report from the consultant indicating his/her findings and attached to the report form. 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 must be attached to the report form.

Payment will be made only after documentation of services has been received and approved by the Activity Director/Coordinator and Title III Director. Travel-related expenses can be paid to a consultant upon request from the Activity Director/Coordinator with appropriate documentation, but these costs must be included on the University request 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 Director's office to ensure compliance with federal regulations covering such service. Specifically, the use of consultants should adhere to the following guidelines:

- The services of consultants and any arrangements associated with their visit will be cleared in advance with the Title III Director to ensure that the purpose of the consultation is in line with the approved plan for the activity and that funds are available.
- *The Consultant/ Participant Request form must be completed and signed by all appropriate parties and the consultant prior to the performance of any services.*
- All rules and regulations that apply to travel by University personnel also apply to travel by consultants.
- Request for a consultant's check must be accompanied with appropriate documentation (receipts, and/or statement of work performed).

Reimbursement for expenses incurred in entertainment or extending hospitality to consultants is prohibited by Federal regulations.

Employees of Huston-Tillotson University may not be paid a consultant's fee except in unusual circumstances, and only if:

- the work performed is in addition to his/her regular departmental work load; and
- the consultant's fee is across departmental lines or the consultation involves a separate or remote operation.

Publications

Activity Directors/Coordinators may, subject to internal institutional policies and to any specific requirements that apply to the Title III grant, decide the format and content of the project materials that he/she publishes or arranges to have published.

- Activity Directors/Coordinators shall ensure that any publication that contains Title III project content contains the following statements:

The contents of this (insert type of publication) were developed under a grant from the Department of Education. However, those contents do not necessarily represent the policy of the Department of Education and you should not assume endorsement by the Federal Government."

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TRAVEL POLICIES AND PROCEDURES

Title III grant regulations require specific documentation of all travel funded by the Title III Program. Approved travel is identified in the original grant application. Any requests for changes in the approved budgets must be submitted to the Title III Director and authorized before change is implemented.

Travel Eligibility (Faculty/Staff)

The determination for significance of travel will be made based on the following:

- Direct service to the institution (how will the training be used to strengthen the institution),
- Institutional critical need areas (will the training address a major institutional challenge identified in the Title III project), and
- A connection to the institution's strategic plan

Necessary expenses for lodging, meals and transportation are allowable and paid in accordance with existing University policy. Receipts are required in accordance with University policy.

Travel Request Procedures

Prior approval is required for all travel. While the Title III Office will process authorized travel requests as expeditiously as possible, such requests must be submitted at least ten (10) working days in advance of the travel.

Pre-Travel

- Complete the Title III [Pre-Travel Form](#).
- Complete a [Travel/Training Request Form](#). This form must be signed by the Activity Director/Coordinator and countersigned by the University reporting supervisor prior to submitting to the Title III Office.
- Attach pertinent information/details regarding travel to justify the expenditure of funds (e.g., agenda).
- Once all appropriate signatures are affixed, forward documentation to the Title III Office. Upon approval by the Title III Director, the forms will then be forwarded to the Business Office for processing. Reason(s) for denial will be given if request is not approved.

Post-Travel and Expense Processing

Within five (5) working days after return from travel, travelers must:

- Complete the [Travel Expense Report](#).
Attach the following receipts/items to the form:
 - ✓ [Trip Report](#)
 - ✓ Lodging bill
 - ✓ Parking, tolls, gas, and other miscellaneous receipts of expenses associated with traveling

- ✓ Copy of program, agenda, letter of invitation or other documentation stating purpose of trip and justification for unusual expenses
 - Attach a copy of the approved Travel Request Form previously submitted along with supporting documents.
 - Secure the appropriate signatures and forward all forms and supporting documentation to the Title III Office for processing.

Allowable expenses will be paid in accordance with existing University policy. Additionally, receipts are required in accordance with University policy.

International Travel

As a general rule, international travel may not be allowed under Title III; however, in rare cases, such travel may be approved on a case-by-case basis with approval by the President **and** the Department of Education.

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CARRYOVER FUNDING

At the end of each grant year (September 30), unexpended funds are “carried over” to the next fiscal year. These funds are made available for projects that are consistent with the theme of the University’s Title III program. Requests for use of these funds must be consistent with the allowable uses of Title III funding, as established in Section 323 (a) of the Higher Education Act of 1965, Part B – Strengthening Historically Black Colleges and Universities.

Please use the model below to develop a proposal for the use of Title III carryover funds.

Specific Request: To utilize \$ _____ in Title III carryover funds to provide, upgrade, offer, etc. (One (1) paragraph summary description)

Description of Activity: Provide a more detailed, but concise description of the need and activities/purchases/improvements to meet the need. Please do not exceed one full page.

Outcomes and Timeline: Provide specific, measurable outcomes, benchmarks, etc.

Proposed Budget: Not all projects will include all cost categories; utilize only applicable line items.

- Personnel
- Fringe
- Travel

- Equipment
- Contractual
- Construction/Renovation
- Supplies
- Other
- **Budget Justification:** Provide detail on budget categories, including names of individuals to be paid, time committed to the project, lists of equipment, need for travel and consulting services, etc.

PROGRAM ACCOUNTABILITY AND EVALUATION

- **Coordination:** Each project shall be developed so as to be in coordination, to the extent feasible, with other programs at the University with similar educational purposes. Such coordination shall continue during the period in which such project remains in effect.
- **Evaluation:** Each project shall include procedures for effective evaluation of the extent to which project objectives are being met.
- **Site Visit:** Site visits will be made by representatives of the Department of Education to: (a) review program accomplishment and management control systems, and (b) provide such technical assistance as may be required.
- **Monitoring by Recipients:** Recipients shall constantly monitor the performance under federally supported Activities to assure that adequate progress is being made toward achieving the goals of the Activity. This review shall be made for each function or Activity as set forth in the approved grant application or contract document.
- **Records Related to Grant Funds:** A grantee shall keep records that fully show: (a) the amount of funds under the grant; (b) how the grantee uses the funds; (c) the total cost of the project; (d) the share of the cost provided from other sources.
- **Records Related to Compliance:** A grantee shall keep records to show its compliance with program requirements.
- **Records Related to Performance:** A grantee shall keep records to identify significant project experiences and results and use the records to (a) determine progress in accomplishing project objectives; and (b) revise those objectives, if necessary.
- **Records Retention Period:** Unless a longer period is required under 34 CFR part 74, a grantee shall retain records for five (5) years after the completion of the Activity for which it uses grant funds.

- ***Unexpended Funds:*** In the event that the amounts previously awarded have not been obligated pursuant to the approved project and in the judgment of the Secretary, will not be obligated for such purposes, the Secretary may upon notice to the recipient, reduce the amount of the grant or contract to an amount consistent with the recipient's needs pursuant to regulations regarding termination and suspension for cause.
- ***Termination and Suspension for Cause:*** Assistance under any Federal program to which this part is applicable may be terminated in whole or part if the Secretary determines, after affording the recipient reasonable notice and an opportunity to be heard, that the recipient has failed to carry out its approved project proposal in accordance with the applicable law and the terms of such assistance, or has otherwise failed to comply with the law, regulations, assurance, term or condition of the grant or contract.

Monitoring

The Title III office monitors all activities that receive Title III funds, and utilizes a variety of mechanisms to ensure that programmatic objectives are realized and budgeted dollars are spent within the timeframe allotted. These mechanisms include:

- 1) Monitoring of project expenditures in comparison to stated objectives and time lines;
- 2) Utilizing quarterly performance reports to monitor progress on objectives and specific tasks as stated in the project descriptions submitted to the Title III office;
- 3) Systematic consultation with activity directors to identify issues that result in slow or excessive expenditure rates or delays in meeting programmatic objectives;
- 4) Scheduled semi-annual or annually site visits with activity directors to assess progress; and
- 5) Meetings with the President and all activity directors to discuss project status, accomplishments, and barriers to successful realization of objectives.

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DEPARTMENT OF EDUCATION REPORTING REQUIREMENTS

The Department of Education requires the University to maintain records that show the amount of funds awarded under each grant; how the spending of funds relates to the overall effectiveness of the institution; how the grant funds were used; the total scope of the project and other records to aid in facilitating an effective audit. The University must keep records that demonstrate compliance with program requirements and records that show significant project expenses.

Applications for Continued Funding Under Title III

Proposed activities, which are approved by University officials for continued funding under Title III, must submit an application during the Spring Semester of the year currently funded, which provides the following information:

- ***An Activity Narrative:*** The activity narrative for continuing activities will be composed of the parts that are described in the following paragraphs.
- ***Activity Objectives for the Next Budget Period:*** Objectives for the next year should be included and must be described in clear, concise measurable terms. These objectives must include the attainment measurement in quantitative terms.
- ***An Evaluation Plan:*** The evaluation plan must provide a detailed assessment of the implementation strategies and quantifiable evidence of the attainment of the objectives for each Activity for each grant year.
- ***An Activity Budget:*** All budgeted items are to be reflected in the format provided by the Department of Education, including major items such as Personnel, Fringe Benefits, Travel, Equipment, Contractual Services, Student Wages and others that allow the Activity to function as efficiently as intended.
- ***A Preliminary Annual Performance Report:*** An Annual Performance Report for Activities will be submitted at the end of each year during the month of October and will reflect accomplishments from October 1st of the previous calendar year to September 30th of the current year. This report should describe the activities' accomplishments to date based on the objectives included in the approved budget. If applicable, a description of any modification to the current plan of operation should be included.

Time and Effort Reporting Requirements

The Department of Education requires the University 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 Title III-funded employee is required to complete a Time and Effort Certification form indicating his/her activities during the month. The certification form must be verified and signed by the employee and reporting supervisor. Completed Time and Effort Certification forms must be submitted to the Title III Office on the tenth day of the following month.
- Copies of completed Time and Effort Certification Forms are to be maintained in the Activity files and Title III Office.

Maintenance of Records

Title III Office, the Business Office, and Activity Directors/Coordinators will maintain records of budgetary expenditures for Title III Activities.

This record keeping will provide up-to-date information relative to the availability of funds and will serve as a cross-reference in the event of contradiction of budget balances maintained in other offices associated with the accounting aspects of the programs.

The Title III Office will provide monthly budget reports to Activity Directors/Coordinators. Activity Directors/Coordinators are expected to maintain records of the actual time spent on activities by personnel in each specific Activity. It is important for the University to document each Title III employee's time and effort in order to meet internal and external audit requirements.

NOTE: Activity Directors/Coordinators will be held accountable to ensure that personnel funded through Title III comply with this requirement. Failure to comply may result in the suspension of future Title III funding.

Reports of Progress in Achieving Title III Objectives

Both internal and external evaluations are management tools used to keep the program focused on annual objectives. EDGAR states that recipients shall monitor the performance of grant-supported activities and report progress according to program requirements. The evaluation should review programmatic progress to assure that positive efforts are being made toward achieving the goals of the grant.

Internal audit evaluations will be carried out through quarterly monitoring reports, annual progress reports and Title III workshops. An external evaluation is recommended annually. The external evaluation will determine progress in achieving the objectives in its approved application, the effectiveness of the project in meeting the purposes of the program, and the effect of projects on the persons directly impacted by the projects.

Progress Reports: In order to provide systematic documentation of the achievement of objectives for each of the grant Activities, each Activity Director/Coordinator will complete a [Mid-Year and End-of-Year Report](#). The report is to be placed on the forms provided by the Title III Office. Copies of the forms are included in this Handbook. Performance Reports are due according to the schedule below:

Report 1 (October 1st - March 31st)

April 10th

Report 2 (April 1st – September 30th)

October 31st

FAILURE TO SUBMIT REPORTS BY THE NOTED DUE DATES MAY RESULT IN A TEMPORARY SUSPENSION OF FUNDING OR AN ACTIVITY BECOMING ELIGIBLE FOR CONTINUED TITLE III FUNDING.

End-of-Year Report Instructions: In addition to the Mid-Year Report, each Activity Director/Coordinator will submit an [End-of-Year Report](#). This report, due no later than October 31st of each year, must provide the necessary information and data to compile the U.S. Department of Education's Annual Performance Report. Specifically, this report should include:

- An Introductory Statement regarding the Activity as it relates to the University at large.
- Completion of relevant process and outcome measures.
- A narrative summary of the status of Activity objectives. In describing the status of activity objectives, consider the institutional impact of the Activity. In this section view the overall impact of the activity to the institution:
 - ✓ Describe the positive impacts the grant activities are having on other areas of the University.
 - ✓ Describe any cooperative activities with other units and staff of the University (non-Title III) and/or with other Title III Activities, and indicate their impact on the institution. Include the expertise of non-grant personnel devoted to the project and the activity's institutionalization plan.

External Evaluation

An independent external evaluator at the discretion of the University President will evaluate the Title III grant, as well as the individual Title III 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 of activity progress in meeting measurable objectives, allowability of project expenditures, and the effect of the project in strengthening the overall operation of the University.

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APPENDIX

Frequently Asked Questions

The answers to the following questions are based on provisions contained in the Program Regulations (34CFR 608 and 609).

Q1: Should Time and Effort reports be maintained for personnel paid through Title III funded programs if institutional policy does not require such reports?

A1: Yes. Time and Effort Reports are required. Grantees are encouraged to review thoroughly the provisions contained in EDGAR, Part 4, Appendix D, J, 7 for a full description of the standards applied in establishing the allowability of costs for compensation for personal services. These standards indicate that a grantee must maintain documentation to support its payroll distribution systems for charges to the grant for personal services.

Q2: Are costs for entertainment and/or speakers allowable under the Title III HBCU program?

A2: Entertainment costs are unallowable by EDGAR (34, CFR 74, Appendix D, 12). However, costs for cultural activities (which may also entertain an audience) that are specifically related to strengthening the academic program and/or to assisting students in successfully completing academic requirements are allowable. Appropriate documentation is needed to ensure compliance: e.g., students' evaluations/reactions to cultural exposures tied to course objectives and required for successful completion of course work or programs of study.

Speakers may also be used to strengthen the academic program and student offerings for successful completion of academic requirements.

In any case, documentation of the relationship to the academic program is required. The limitation of supplanting also applies to these allowable activities.

Q3: What is the procedure for submitting requests for revisions and transfers of funds under the new legislation?

A3: The new legislation did not change the procedures. The requests should be addressed to the Title III Director. The Title III Director communicates all requests to the Department of Education Program Officers. The grantee must justify the reason(s) for

the change and the appropriate budget breakdown associated with it. The request should be submitted at least 30 days prior to the requested effective date.

Q4: Can students be paid out of Title III/HBCU funds to perform needed project tasks?

A4: There is no specific statutory or regulatory guidance on payment to students to perform project tasks. However, the EDGAR regulations stipulate that costs shall be reasonable and consistent with established institutional policies and practices applicable to the work of the institution generally (34 CFR 74, Appendix D, C, 2). Student employment must be justified and necessary to meet activity objectives, like all proposed costs. Student employment should also be based on appropriate selection criteria and qualifications to carry out project tasks, if requested for Title III approval.

Q5: What budget revision and programmatic changes require prior approval?

A5: The following budget revisions require prior written approval: (1) to transfer amounts budgeted for student support (tuition/stipends/fees); (2) to establish new line items; and (3) if a grant provides support for both construction and non-construction work, prior approval is required before any budget transfers between the two types of work can occur.

EDGAR 74.103 requires prior approval for the following programmatic changes: (1) changes to project scope or objectives; (2) changes in key personnel; and (3) to continue the project for more than three (3) months without the direction of a project director.

Q6: What is meant by financial and compliance audit?

A6: When an approved recipient accepts funds under federally assisted programs, the recipient assumes the responsibility for carrying out the programs efficiently, economically, and effectively as well as assuming responsibility for auditing financial operations.

The financial and compliance audits are those which, at a minimum, examine the recipient's systems of internal control, which ensures compliance with laws and regulations affecting the expenditure of funds, financial transactions and accounts, and financial statements and reports of the recipient's organization.

The U.S. General Accounting office has published a booklet titled, *Guidelines for Financial and Compliance Audits of the Federally Assisted Programs*. This booklet may be obtained from the Superintendent of Documents, U.S. Government Printing office. The Department of Education does not stock this document for distribution.

Q6: Are Title III funds allowed to purchase promotional items?

A6: Promotional items are unallowable by Cost Principles: 2 CFR 220 (A-21), Appendix A; section J. Below are other unallowable costs:

- Advertising and public relations designed solely to promote the institution
- Alcohol
- Costs of meetings, conventions, convocations, or other events related to other activities of the institution
- Costs of meeting rooms, hospitality suites, and other special facilities used in conjunction with shows and other special events
- Costs of displays, demonstrations, and exhibits
- Promotional items and memorabilia, including models, gifts and souvenirs
- Alumni activities and similar services
- Entertainment (amusement, social activities, tickets to shows or sports events, etc.)
- Furniture (for Title III Office ONLY and any other exceptions must be approved by DOE)
- Lobbying
- Goods or services for personal use
- Organized fund raising (financial campaign, endowment drives, solicitation of gifts or bequests)
- Membership in any civic, country club, social/dining or community organization
- Student recruitment (an outreach program is allowable)
- Student activities (intramural, student publications, clubs or other student activities)

[Cost Principles \(OMB Circular A-21\) Link](#)

[Allowable and Unallowable Costs Guide](#)