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GETTING STARTED

So, you think you have a great idea that needs funding? Where do you start? What steps are involved? Is there money out there to fund your great idea? Do you need Supervisory/College approval? These and many other questions arise when acquiring funding to turn your idea into a successful reality. This *Grants Management Handbook* (henceforth referred to as Grants Handbook) is the beginning. It will take you through a step-by-step process and serve as a resource to make your venture seamless and successful.

In setting up this manual, like any project, it is recognized that people come and go, roles and procedures change, and therefore the grant development process is “fluid”. There are differences in the type of grants (i.e. Federal, State, Foundation, or Private) and how they are treated. We have attempted to answer as many questions as possible on the front-end to alleviate headaches going forward. This handbook will take you through the initial steps of grant development, through your award process, and finally through grant implementation and compliance towards grant reporting and close-out. Throughout each step, there are many people with the expertise and know-how to assist you, and this handbook will attempt to guide you on your way to a successful grant experience.

We hope the *Grants Handbook* will serve as a resource of general information designed to help you get started. Its purpose is to provide an overview of college processes used to develop and manage grants. These processes reflect grant-specific policies at the College that have been approved by the president’s cabinet (included as Appendices A-G). Some processes are still in development and do not yet have an approved policy attached to them. As a result, this handbook may occasionally raise more questions than it answers, which is not entirely outside its purpose. While many routines are common to all grant programs, there are always others that are different, new, or unique, and one resource guide simply cannot address every variation. The *Grants Handbook*, therefore, hopes to help you discover where to go for help as you develop questions at any time during your program implementation.

Okay, with that said: at the end of the *Grants Handbook* is a list of Key Madison College Contacts, organized by their respective departments, who can help you manage your grant project—along with a glossary of Acronyms, Definitions, and Terms. These individuals work in collaborating offices such as Finance, Human Resources, Purchasing, and Budget, and they are available to support your program implementation. The key to running a successful grant project is collaboration, and the *Grants Handbook* seeks to provide that “go-to” list for help. The flow chart below provides a visual depiction of the grant process, all the way from initial idea development to project implementation and close out; this flow structures the following chapters in this manual.
We wish you much success as you deliver the programs and services made possible by your grant project, and we appreciate the value brought to Madison College by your efforts. Always feel free to contact us if we can provide any further assistance.

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**Grant Development Process**

**Principal Investigator (PI)** notifies the Grants Office of interest and receives a Grant Approval Form/confers with Grants Staff on scheduling.

PI obtains approval of their Dean and VP with signatures on the Grants Approval Form, returns form to the Grants Office, then convenes team.

Grants Office and project team develop 1st draft of project, including a full budget draft.

Grants Office and project team develop final draft of project, including a final budget, during back-and-forth process of gathering data.

Final budget goes for review to PI and other stakeholders as needed.

Grants Office submits final proposal to funding agency.

Funding agency notification of award.

Communication of award to internal and external stakeholders.

Grant project set-up in college finance system.

Kickoff meeting held at Grants Office with PI, Grant Accounting, HR, IRE, and others as needed.

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*Project Implementation Begins!*
GRANT DEVELOPMENT AND SUBMISSION

INITIAL IDEA DEVELOPMENT AND GRANT APPROVAL

If you are truly in the beginning stages of formulating a project for which you would like to seek grant funding, the Grants Office will assist you in giving shape to your idea. Our Idea Development Form will get you thinking about the kinds of questions you will need to answer in order to propose your idea effectively to funders as well as college leadership. For example, in what way does your idea align with larger national initiatives in higher education? How does it align with the Pillars of Promise and/or the Impact Initiative? Besides this, the Idea Development Form will document your idea so that the Grants Office can officially begin the search for appropriate grant opportunities.

Once we have identified a funder that is a good match for your project and an actual grant competition opens, the Grants Office will work with you to submit our Grant Approval Form to your dean and the appropriate college VP for signature. This form will provide leadership with critical information about the grant itself along with the commitments (staff, facilities, etc.) it will entail for the college both during and after the project. It also signals the Grants Office that we are clear to begin the grant development process with you in earnest. This process is essential in helping the college prioritize which grant proposals to move forward, given our limited time and resources to effectively engage in the exciting grant opportunities that come our way.

DEVELOPMENT AND WRITING OF DRAFT PROPOSAL

The actual writing of the narrative sections of a grant proposal is most often a collaborative process between the principal investigator (PI) who wishes to apply for the grant and the grant developers in the Grants Office. How much writing either party engages in depends on content knowledge about the particular area the grant addresses, the relative experience the principal investigator has with the grant writing process, and the grant developers’ current capacity in terms of workload. In many cases, the grant developers have helped write numerous proposals for particular funders and are therefore skilled at interpreting what the proposal must address according to the RFP. Similarly, faculty members, associate deans, and other principal investigators have deep knowledge of the field or discipline and its specific content. In such situations, the grant developers may take a more active role in writing the statement of need while the principal investigator will be more active in writing about the project plan—particularly regarding curriculum or instruction.

Though grant applications vary, typically required elements include: a statement of need, a discussion of project goals and measurable outcomes, a description of project activities, a management plan, and a budget. Identifying who will take responsibility for writing specific sections will take place early in the development process and will be
represented in a project management flow chart that includes a timeline. The flow chart also includes items such as data requests that we will need to submit to Institutional Research and Effectiveness or required letters of commitment from project stakeholders. However, please note that although either party may have initial responsibility for writing a proposal section, the resulting draft will be read and commented on by the entire project team. This collaborative style ensures not only that the writing itself is as strong as possible but also that the sections adequately address all requirements and review criteria described in the RFP for the grant.

**Budget Development**

Once a grant opportunity is identified and the Grant Approval Form is being completed, principal investigators/project managers and Grants Office staff will review the RFP to determine the budget parameters. The main questions at this stage are: What costs are allowable (including indirect)? Is match required? What is the maximum award amount?

Grants Office staff will ensure that costs are reasonable, allocable, consistent, and allowable:

- **Allocable**—the cost must provide direct benefit to the project and be proportionate to the approved activities.
- **Consistent**—costs incurred for the same purpose in like-circumstances must be treated consistently as either direct or indirect expenses.
- **Allowable**—the costs conform to the limitations or exclusions set forth in the RFP and the OMB Uniform Guidance. If a cost is unallowable as a direct cost, it is also unallowable as a match or cost share expense.

As an adjunct to this process, the RFP or grant guidelines will be sent to the appropriate parties (Finance and/or Budget Office) for an initial review of fiscal aspects of the project and potential issues/impacts.

Project outcomes are operationalized, and project managers work with grants staff to identify what will be required to carry out the project on the ground. For example: if staff costs are allowable and you intend to use grant funds to offer short-term training opportunities, how many part-time or full-time faculty will you need to do the work? Will you need PSRP support or supplies? This is also the stage where the funder’s budget guidelines are considered in light of project needs and college finance policies/procedures. If you will need a particular type of equipment for your project, will the cost reach the threshold at which we would need to solicit competitive bids from qualified vendors?

After project needs are identified, budget development will be done using the Grants Office’s budget development spreadsheet. This tool has projected costs for vacant positions built into it along with appropriate escalators for future project years. If project managers have identified incumbent faculty or PSRP who they would like to work on the project, the Grants Office will solicit projected annual salary and fringe rates from the Budget Office. These rates
will be inserted into the budget development spreadsheet. For vacant positions, rates will pre-populate once the appropriate employee classification is selected. In either case (incumbent or vacant) rates will be automatically escalated depending on how many years the staff member will work on the project. Additionally, the spreadsheet automatically calculates staff costs based on the percent of time and effort that the staff member will be involved in the grant.

Once the budget has reached a semi-final stage and the grant is nearing readiness to submit, grants staff will forward the budget development spreadsheet to the PI for review. When necessary we will send the spreadsheet to college leadership to identify potential impacts, such as the need for increased tax levy for matching funds. When the review is complete, the Grants Office staff will fill out the appropriate budget template for the grant.

**Final Submission**

The form and method of the final grant submission varies widely in complexity and labor-intensiveness from funder to funder. In any case, only the Grants Office has authority to submit grants on behalf of the college. The Grants Office assumes final responsibility for ensuring that all required proposal elements are packaged and formatted according to what the funder states in the grant RFP.

Each funding agency has its own required means of submitting a proposal. In recent years, almost all funders have started requiring electronic submissions. While in some cases this can be as simple as e-mailing a proposal to an address identified in the RFP, in most cases it requires navigating complex online submission systems. For example, federal grants typically require submission through the Grants.gov website. Using this system requires an Authorized Organizational Representative (AOR—in this case the grant developers or grants director) to download an Adobe application package that has to have all proposal documents and a number of compliance documents (such as Certification Regarding Lobbying and Anti-Debarment) attached to it before it can run an error check and finally be submitted. Our office is often a beehive of activity on submission deadline days—we encourage you to join us to familiarize yourself with this exhilarating process and to be available if we have any last-minute questions or concerns!

**Grant Award and Implementation**

I WON THE AWARD! NOW WHAT?

Congratulations on your award and your new project! As you prepare to start your grant program, the Grants Office wishes to recognize your accomplishment. Project managers are responsible not only for program activities but also for financial activities. In some
instances this necessitates new skill sets, and even experienced grant managers may encounter new grant requirements.

**STEP 1: GRANT ACCEPTANCE**

Grants, cooperative agreements, and grant contracts or subawards are considered restricted projects with special requirements that the College and grant project managers need to follow. Implementing a grant project is serious business. To begin, the award needs to be formally accepted and processed by the College.

Documents indicating that a grant has been awarded can come into the college in a variety of ways. Some go to the Grants Office, some head over to the President’s Office, and others are sent to the PI. The first step is to send copies of all materials to the Grants Office, which will coordinate the various stages of acceptance. The Grants Office will make copies of the award documents for all necessary offices.

In some instances, there may be a negotiation period. The awarding agency may want changes to the proposal we submitted. Any changes in the proposal must be formally accepted by the College. The Grants Office must be involved with this step to assure the College is protected. Many times an award is offered at a different funding level than originally proposed, so it is always a good idea to note the amount of the award on the documentation. If the amount of funding is different, budget revisions go through the same procedure as the initial budget development through the Grants Office. In such cases, the funder will often require a formal revision to the original proposal and budget, which the funder will then need to approve before the final award letter will be released.

Most times the award documents need to be signed by the Vice President for Administrative Services, with a signed copy returned to the granting agency. The Grants Office facilitates obtaining signatures and returning them to the funding agency. The Grants Office also communicates the fully executed grant award to the PI, Budget Manager, and Grant Accounting.

Often there is a deadline for returning signed documents to the awarding agency. It is important to complete the acceptance process promptly so that the award can be processed and the project set up as soon as possible.

**STEP 2: GRANTS HAND-OFF MEETING**

Once the award acceptance process is complete, the Grants Office will set up a *Grant Kickoff* meeting. The purpose of this meeting is a formal transition from the grant development stage to grant implementation. In this meeting the PI, supervisor of the PI, Budget Manager, Grant Accounting, Human Resources,
IRE, and other business units involved in the implementation of the project meet to talk over roles and responsibilities of each party involved in the grant and to develop a plan to ensure a successful transition to the next step of the grant process.

Please note that Step 2 may be happening simultaneously with Step 3

STEP 3: PROJECT SET UP

Establishing Budget Authority – (within the College’s financial accounting system)

Upon notification from the Grants Office of an approved grant award, Grant Accounting will do the following:

- Map the approved grant award budget to an appropriate accounting structure (i.e. accounts, departments, program, etc.) that aligns with both the College’s financial policies and control systems—as well as meets all WTCS, federal, and state reporting regulations.
- Establish the project number, and assign and load both the accounting structure and budget authority into the financial accounting system.
- Disseminate accounting structure to key stakeholders, including project managers, Budget Managers, Grants Office, and other Grant Accounting staff.

The same process would apply to any subsequent budget revisions or no-cost extensions to the original grant award.

INSTITUTIONAL REVIEW BOARD (IRB)

Many grants require IRB approval to protect human subjects. Usually after the grant award, the funder will ask for documentation of IRB approval. Madison College encourages and supports the scholarly endeavors of students, faculty, and staff of the College. Pursuit of scholarly work and research will often involve the use of human subjects for data collection and analysis. Madison College’s IRB reviews human subject research proposals to ensure that the rights and welfare of human subjects used in research studies by College personnel are protected, that risks have been considered and minimized, that the potential for benefit has been identified and maximized, that all human subjects only volunteer to participate in research after being provided with legally effective informed consent, and that any research is conducted in an ethical manner and in compliance with established standards. Those individuals seeking to conduct such research may not solicit subject participation or begin data collection until they have obtained clearance by the Madison Area Technical College IRB.

Some research projects involving human subjects are exempt from IRB approval requirements. These generally exempt research types include normal educational practices like work undertaken as a part of a course, educational tests when the subjects are not
identified, and surveys or interviews in which the subjects volunteer and are not personally identified.

The IRB for Human Subjects Research at Madison Area Technical College has responsibility to oversee procedures for carrying out the College’s commitment to protect human subjects in research. The role of the IRB is to review proposed research projects that involve the use of human subjects, ensure that the individuals involved in the project are treated ethically, ensure that all subjects are provided with substantial information about the study and consent to be a subject in the study, and that all private information will be handled with confidentiality. The IRB is authorized to review, approve, require modifications in, or disapprove research activities conducted by or through the College using human subjects.

The IRB does not assume the role of evaluating the soundness of the proposed research study, the merits of the research design, nor the potential contribution of the research to the scholarly literature. In addition, the IRB does not facilitate the collection of data or disseminate surveys to the college population on behalf of individual researchers. Rather, the IRB is charged with evaluating each project’s compliance with ethical standards in regard to issues such as informed consent, confidentiality, and any risk to the participants.

For more information please visit: http://madisoncollege.edu/IRB

EXPENDING FUNDS

Once the award is accepted and the project is set up in the system, the project manager can begin to implement the program and spend funds. All approved project expenses need to be posted to the grant budget—not the unit’s general fund budget. The next few sections provide some guidance about expending funds. The key is to spend the project funds as defined and within the grant period. It is not in our best interest to under-spend and not utilize all the grant funds by the end of the project. Conversely, over-spending of a grant is not allowed. It is critical, therefore, to Madison College’s financial integrity that full expenditure of project funds as defined within the grant period occurs. As always, assistance from the Finance Office is available throughout the grant period.

SUBAWARDS AND SUBCONTRACT AGREEMENTS

There may be a need to provide funds to another agency in order to carry out part of the project. The Grants Office will work with you to determine whether the arrangement meets the definition of a subrecipient/subawardee or contractor/subcontractor and will assist you in fulfilling the procurement guidelines and approvals associated with each type of relationship.
A subrecipient is an organization (non-Federal) that receives funds from Madison College in order to carry out part of a Federal program. A subrecipient is an organization that meets the following characteristics:

- Has its performance measured in relation to whether objectives of a Federal program were met;
- Has responsibility for programmatic decision making;
- Is responsible for adherence to applicable Federal program requirements specified in the Federal award; and
- Uses the fund to carry out a program for a public purpose rather than providing goods or services for the benefit of Madison College.

A subaward refers to the agreement provided by Madison College to a subrecipient to carry out part of a Federal award. There are generally two scenarios under which a project may involve external partners in a substantive way and thus needs a subaward agreement: either Madison College is the lead on a grant, or a collaborating partner is the lead. When the college is the lead, this means that we are responsible for monitoring that the partner organization—with which we are making a subaward—both performs within their scope of work and meets all additional applicable federal requirements. This usually has implications for which documents are included with any agreement and generally dictates who is authorized on behalf of the subawardee organization to sign subaward contracts. This distinction is important because subawardees are bound by most of the same federal regulations, financial management, reporting requirements, and performance accountability as the lead organization.

A contract (or subcontract) is a legal instrument by which Madison College purchases property or services needed to carry out the project or program under a Federal award. A subcontract is for the purpose of obtaining goods and services for the non-Federal entity’s own use and creates a procurement relationship with the contractor. An agreement meets the definition of a contractor if the following conditions are met:

- Provides the goods and services within normal business operations;
- Provides similar goods and services to many different purchasers;
- Normally operates in a competitive environment;
- Provides goods or services that are ancillary to the operation of the federal program; and
- Is not subject to compliance requirements of the Federal program as a result of the agreement, though similar requirements may apply for other reasons.

All of the characteristics might not be present in all cases; the Grants Office will assist you in categorizing the relationship correctly. Subcontracts must also follow our procurement policies of the College as well as the Federal Government. Any contracts of supplies or services using grant funds exceeding $3,000 must obtain two written quotes. **Please Note:** As directed by Section 200.320 of the Uniform Guidance, the $3,000 micro purchase limit for grant funded purchases is lower than the general college threshold of $5,000.
It is probably clear by now that initiating or being party to a grant subaward agreement needs to follow a defined organizational process which involves a range of college staff. There are only a few employees in the district who are authorized to make or enter agreements on behalf of the college; they do so only after an initial review for grant alignment and compliance requirements by the Grants Office, followed by a review by the college’s legal advisor. Fortunately, most subaward agreements include largely boilerplate language and addenda, and their format typically follows one of a few templates. The lead organization generally creates the subaward. The document outlines at minimum the expected tasks, deliverables, time period/dates, amount of funding for the partner, and any other requirements flowing from the funder (such as with reporting and invoicing). Grant Implementation staff within the Grants Office will assist the PI in navigating the internal contract development and review process with our Legal Advisor, as well as with securing appropriate signatures and interacting with the partner organization. If you have questions or need to process a subaward, start with the Grants Office. Grants Office staff will assist you in understanding the function of the subaward within your project and facilitate the development of the scope of work and subaward budget. For a subaward template, go to http://madisoncollege.edu/in/legal-advisor and review the Madison College Contracts Manual, or contact our Legal Advisor for further advice.

**Hiring Project Personnel**

If new positions are created as a result of the grant, project managers should work closely with Human Resources (HR). Project positions should be consistent with other positions at Madison College in terms of job descriptions and salary scales. HR will gladly provide guidance. When new staff needs to be hired, it is highly recommended that HR processes are started immediately because they take time to complete.

Most proposals include a section on “key personnel.” Regular district employees may be included in the grant proposal with plans for their reassignment to the new project. A regular employee who accepts a grant-funded assignment or project will maintain all the rights and privileges appropriate to his or her contract. For other grant-funded positions, an abbreviated job description may have been included in the grant proposal, as well as a statement indicating that the position will be filled in accordance with District policy and Equal Employment Opportunity guidelines. Full Madison College job descriptions are almost never used in proposals because their length exceeds the space allowed in the proposal guidelines. Position titles used in the proposal must make sense to the proposal reviewers and program officers, so they may differ from the working title used by Human Resources.

- **Following Hiring Policies**
  New grant-funded positions must be filled using the same Madison College policies and procedures used for hiring all employees. Hiring Managers responsible for filling positions should pay close attention to how the grant describes the responsibilities and qualifications of the positions and any special requirements. Each area of the
College is assigned an HR Business Partner. Employees are encouraged to contact the HR Business Partner for their work area for assistance in understanding hiring procedures and facilitating the hiring process. This connection should be made once you are aware that you will hire new positions.

- **Posting a Position**
  Unless a specific regular Madison College employee is named in the proposal to serve in a particular role, a new grant-funded position will have to be advertised internally and/or externally as a “limited term, grant-funded” position. This will require development of a complete position description if a comparable position does not already exist at the college. In addition, a PSRP position may need to go through reclassification before it can be posted. Lastly, the online **Position Requisition Form (PRF)** must be competed and approved before a position can be posted. It is advisable to begin this process as early as possible. Again, contact your area’s HR Business Partner to work your way through this process.

- **Hiring Consultants**

  Grants often include the services of consultants. It is appropriate to use consultants for services directly related to the purpose of the grant such as evaluation, curriculum development, etc. According to the Uniform Guidance, this type of relationship would be defined as a subcontract. Services such as provision of food, transportation, etc. are not appropriate for contracts and should be handled through the “Other” section of grant budgets.

  External consultants are hired either through a Contract Services Agreement (if over $10,000) or are paid through a Consultant Reimbursement Form (under “C” at [http://intranet.madisoncollege.edu/forms-db/index.php](http://intranet.madisoncollege.edu/forms-db/index.php)) if under $5,000. The services will have to be secured through competitive processes as specified in College policies. It may be possible to offer a contract on a “sole source” basis if it can be demonstrated that the item or service is only available from a single source or that the Federal or other grantor agency authorizes noncompetitive negotiation. PIs should seek the advice of the Grants staff and/or the Purchasing Department to make sure they comply with the applicable regulations, including federal regulations.

  Grants normally specify and provide qualifications, and they frequently name the external consultant in the proposal. Naming a consultant in the grant application does not circumvent the requirement of following the college’s procurement policies. The proposal also specifies the work to be accomplished and the grant budget includes information about the amount to be compensated. This information will be used in the development of the contract or reimbursement claim. For more information, go to [http://madisoncollege.edu/in/contracts-and-templates](http://madisoncollege.edu/in/contracts-and-templates) and review the *Madison College Contracts Manual*. 
All grant subcontracts must be signed by the Vice President for Administrative Services, following a series of internal reviews. Contact the Grants Office if you have a contract requiring such a signature in order to ensure that the appropriate reviews are performed. The VP’s office will not sign the contract prior to Grants Office and Legal reviews.

**Important:** The Contract Services Agreement or Consultant Reimbursement process cannot be used to hire current District employees.

Sometimes it takes time to create a position description, obtain approval, advertise, and then hire. It is not uncommon to face delays while completing the hiring process. For example, twelve months of salary may be provided in the project budget, but two months could be spent to complete hiring. If needed, an amendment can be submitted to the granting agency to request an extension of time or transfer funds to a new category (see the Amendment/Revision Section on page 19). Again, it is important that you begin work on these activities as early as possible.

**TIME ENTRY AND PEOPLESOFT/WORKDAY GUIDELINES**

For existing employees who spend some of their time working on a grant project, the most important thing to remember is to charge hours correctly. Make sure that grant hours are charged to the grant budget, *not* the division’s general fund budget. This includes faculty working on a grant. It is imperative that faculty be given the proper chartfields to charge their time accordingly.

**TIME AND EFFORT REPORTING**

Time and effort reporting is the federally mandated method of certifying that the salary and benefits charged to a federal grant are accurate and aligned with the effort and activities approved by the funder. It is after-the-fact documentation of how each grant-funded employee spent their time during a given period (effort), related to both grant-funded and non-grant-funded work activities. Recipients of federal grants and cooperative agreements are only allowed to charge reasonable, allowable, and allocable costs to their sponsored projects. Grantees must also maintain “records that accurately reflect the work performed.”

The federal government requires time and effort reports for all faculty and staff who are compensated, in whole or in part, by a federal grant or whose efforts are used to satisfy a required or voluntary match for federal grants.
The Madison College Time and Effort guidance is available in Appendix F.

**Purchasing Processes & Requirements**

Your first source for answers to purchasing questions or for assistance making purchases should be your supervisor and departmental staff. These are the staff that make college purchases on a routine basis and, therefore, understand Madison College policies best and can facilitate the process for you. In addition, your supervisor is the person who will ultimately approve all purchases charged to the grant, so it’s a good idea to confirm your plans with him or her before moving forward.

The Procurement Department is responsible for administering the district’s procurement policy and monitoring activities to ensure compliance. All Request for Bids (RFB) and Request for Proposals (RFP) are administered through the Procurement Department to ensure that the process complies with all applicable laws and regulations, including the requirements of the WTCS Financial Accounting Manual. The purchasing policy looks at aggregate purchases from the same vendor during the fiscal year.

- Purchase orders require the approval of the appropriate departmental supervisor and the confirmation of available budgetary funds.
- A purchase order or a District Credit Card must be used for the procurement of goods and services. The Madison College Purchasing Matrix outlines allowable purchasing methods for dollar thresholds.
• The District shall not discriminate against any vendor, business, or individual who offers
to provide goods or services on the basis of age, race, color, sex, creed, disability,
political persuasion, ancestry, sexual orientation, or for any other reason prescribed by
law, whether federal, state, or local ordinance.
• The only persons who are authorized to sign contracts on behalf of Madison College are
the President, any position at the level of a vice president, or any individual designated
by the President and as outlined in the corresponding Administrative Policy #103.
Legal will review contracts on a case-by-case basis to determine the acceptable risk
level if further negotiation is necessary, whether by legal or by the business manager.

Purchase Thresholds:
• Splitting large purchases into smaller purchases in order to bypass procurement rules is
prohibited.
• All Purchases must comply with the dollar thresholds as noted, unless outlined in the
Bid Waiver Section below.
• District Board approval is required for sole source procurements of $50,000 or more. A
sole source is an item or service that is only available from a single source. [Wisconsin
Administrative Code TCS 6.05(2)(d)]
• All procurements for printing services greater than $250 and less than $25,000 shall
require at least two quotations, since printing costs can vary substantially between
vendors. Printing procurements of $25,000 but less than $50,000 require three written
quotes. Any printing procurements of $50,000 require a Request for Bids.
• Other Non-Construction Related Purchases:
  o Total Cost is less than $5,000: may be obtained at buyer discretion. Two quotes
    are recommended. [Madison College Policy]
  o Total cost is at least $5,000 but less than $25,000: requestor needs written price
    quotations from at least two sources. The lowest price for the best quality
    should be used to determine the vendor. [Madison College Policy]
  o Total cost is at least $25,000, but less than $50,000: written quotations from a
    minimum of three vendors are needed. [Wisconsin Administrative Code TCS
    6.05(2)(f)]
  o Total cost of $50,000 or more: requires a competitive sealed bid process, via
    either Request for Bids or Request for Proposals. [Financial Accounting Manual]
    [Wisconsin Statutes 38.18 and 62.15(1)1, (11), and (14)] [Wisconsin
    Administrative Code TCS 6.05 (2) (c)]
• Purchase orders are initiated by entering required information into the PeopleSoft
Financial system. This must be done by staff that are trained and authorized to do so,
most commonly departmental support staff. This process involves a series of budget
checks and other steps to ensure necessary information is obtained and purchasing
procedures are followed. It also requires your supervisor to approve the request in the
system before it advances to the generation of an actual purchase. It is the Project
Manager’s responsibility to provide the information and associated documentation
needed in order for departmental staff to successfully generate a grant PO. Even if an
electronic PO is successfully submitted it will not move forward until any required
follow-along documentation (e.g. price quotes, travel approval forms) is received by the
purchasing department.

- Purchases made with grant funding must follow all applicable guidelines as outlined in
  the granting agency’s letter of award and follow our internal purchasing process.

- The RFP document will also include information concerning allowable expenses under
  the grant. It is the responsibility of the Program Manager and his or her supervisor
to be informed about allowable expenses in advance of applying and follow all
applicable funder and Madison College fiscal policies and procedures.

Project managers are responsible for all project expenditures. A good place to start is
ensuring that all paperwork, whether a purchase order or invoice, is noted with the proper
account chartfields as well as the name of the project. It’s always important to verify that there
are funds in the program budget to cover the costs.

For any purchase, it is important to think about possible unallowable expenses that may
not be covered or approved by the grantor. Alcohol is never covered by federal funds. For
example, if you attend an overnight conference as part of the project, dinner would be
allowable but a glass of wine with the meal would not. Some grant projects will not cover travel
or computer equipment, so it is always good to review the award documentation and approved
budget ahead of making purchases. See the following section for more information about
unallowable expenditures.

The flip side of purchasing is payment. Once a purchase has been made, payment is
processed through Accounts Payable. Upon receipt of the goods or service, Accounts Payable
will need a copy of an itemized invoice and a signed approval for payment from your supervisor
before payment is made to the vendor. If invoices are not submitted for a purchase, vendors
will not get paid. Make sure that you obtain invoices and receipts for all completed
purchases and maintain copies of all documentation related to grant purchases in an
organized filing system.

**Unallowable Expenditures/Costs**

**Expending Funds: Unallowable Expenditures/Costs**

The following list is for general purposes only. All costs applied to grant chartfields/work tags
should pass the test of being reasonable, allowable, allocable (specific to the project) and
consistently treated. Consider whether you would feel comfortable explaining a particular cost on
a federally funded grant award to an auditor or a member of the press. If not, a non-grant
chartfield/work tag should probably be used.
Check with your Grant Accountant before applying any of these expenses to a federal award, even if you feel you have an exception to the rule. Excellent documentation is always important in passing an audit.

NEVER ALLOWABLE
- Alcoholic beverages
- Alumni
- Bad debt
- Contingency provisions
- Entertainment costs (even on business trips)
- Contributions or donations, including cash, property, or services
- Costs incurred in connection with any criminal, civil, or administrative proceedings
- Fines and penalties
- Cost of promotional items and memorabilia, including gifts and souvenirs
- Fund raising and investment costs
- Goods or services for personal use
- Housing and personal living expenses
- Institutionally furnished automobiles or other vehicles
- Lobbying costs, at any level of government
- Losses on other sponsored agreements or contracts (it is not allowable to cover an over-expenditure on one grant by using funds from another)
- Recruitment and relocation costs for employees not working on the grant (allowable for grant-funded employees; however, if employee resigns within 12 months of hire, recruitment and relocation charges related to that employee must be moved off the grant)

LESS COMMONLY ALLOWED- ONLY IN CERTAIN CIRCUMSTANCES
- Payroll for university employees not engaged in the grant’s activities
- Payroll in disproportionate amounts to the work performed on the grant (i.e. a research assistant working half her time on a research project may not receive more than 50% of her pay from that award)
- Professional service costs when work could be performed by qualified university personnel
- Proposal costs, including payroll for personnel working on the proposal
- Conference and meetings
  - Ensure that the primary purpose of the meeting is the dissemination of technical information beyond the non-Federal entity and it is necessary and reasonable for successful performance under the Federal award (Uniform Guidance 200.432)
  - Allowable conference costs paid by the College as a sponsor or host of the conference may include rental of facilities, speakers’ fees, costs of meals and refreshments. The Uniform Guidance has emphasized that Conference
hosts/sponsors must exercise discretion and judgment in ensuring that conference costs are appropriate, necessary and managed in a manner that minimizes costs to the Federal award

**There are often limitations related to the following items - if you are uncertain please check with the grants office**

- Food costs *(except for study participants or meals while traveling that abide by normal university policies)*
- Office supplies
- Publication and printing costs *(except when a report is sponsored by the federal government)*
- Advertising and public relations costs *(except in the case of recruitment for a position necessitated by the grant or public promotion of the grant activities)*
- Capital expenditures (> $5,000) not pre-approved by federal agency *(may become allowable if approved by federal agency)*
- Commencement and convocation costs
- Computers and other technological devices, including cell phones, iPads, printers, etc. *(unless demonstrably to be used for the purposes of a grant only and included in proposal budget submitted to federal agency)*
- Memberships and subscriptions *(except when necessitated by the grant)*
- Postage *(included in F&A, exception can be made if large mailing is necessitated by the grant)*
- Selling and marketing costs
- Student activity costs *(unless specifically provided for in the grant award)*
- Telephone—local charges *(included in F&A, long distance charges for specific purposes of the grant are allowable)*
- Tuition & fees *(except for training grants or tuition remission as, or in lieu of, pay for graduate students working on that particular grant)*

**Keeping track of expenses**

When expending funds, it’s important to avoid under-spending or over-spending. Here are some helpful hints about keeping track of expenditures:

- Set up a folder, three-ring binder, and/or a spreadsheet for the project.
- Create a page/tab for each chartfield category (supplies, travel, equipment, consultant, etc.) similar to your checkbook register.
- Post the amount of funding for each category at the top of the page or in a spreadsheet cell.
- Each time funds are spent in that category, record the amount on the register/spreadsheet and subtract the expense to calculate the balance that remains.
- Put receipts behind the corresponding category page in the binder, or maintain folders for each non-salary expense category in which receipts are then filed.
AMENDMENTS/REVISIONS – WHAT IF PLANS CHANGE?

As a grant project proceeds, it is not uncommon that changes will need to be made to the project plan or scope due to changing circumstances or focus. Changes to the project plan can arise from a straightforward recognition of what has been working during implementation compared to what was originally proposed. They can also come about from concrete circumstances, such as hiring project staff taking longer than expected or recognizing that the project end date needs to be extended in order to spend out remaining funds and meet planned outcomes (in which case the College would request a no-cost extension from the funder). These changes to plan or scope are often actualized through changes to the budget so that spending remains in alignment with grant activities and changing circumstances.

It is important to know that all funders have specific guidelines about which changes require a budget revision and/or formal approval, and it is also vital to have varying requirements related to specific items or changes within the budget. Additionally, there are situations where the funder may not require a formal revision, but college policy requires an internal budget revision to ensure appropriate budget authority can be allocated and communicated through our financial and human resources/payroll systems.

The Budget Revision Policy can be found in Appendix B on page 34.

RECORD KEEPING FOR EFFECTIVENESS AND COMPLIANCE

As with financial records and time and effort reporting, it is essential to maintain an organized approach for documenting and tracking all the programmatic activity that is occurring in your project. Grant projects typically have a defined Scope of Work, sometimes expressed through the goals and activities outlined in the original application and other times defined in a post-award document or grant agreement. In either case, there is an expectation that given project activities will occur according to the grantor terms and will track reasonably close to what was promised in the grant application. It is important to become very familiar with these requirements and expectations and to establish a system to document your progress in carrying out project activities, while also maintaining records that show you have done so in a compliant manner. Utilizing some form of Project Log is highly recommended. A log can be organized chronologically, by activity/requirement, or as some hybrid of the two. For example, if a grant involves providing professional development workshops for teachers, a section of the log could be devoted to recording the chronology of work done by you or others funded under the project in developing the workshop content and structure, as well as carrying out the marketing and recruitment for the workshops. Alongside the log, a sign-in sheet used by the workshop participants provides back-up evidence that confirms workshop attendance (and may also be required by the funder), and completed workshop evaluations provide
effectiveness data that may be part of your evaluation plan for the project. A Project Log provides a record of the life of a project that will prove especially helpful when it’s time to complete programmatic reports or when you need assistance troubleshooting a problem.

Regardless of the system you set up for tracking project progress and documenting project deliverables and outcomes, maintaining good records in a consistent fashion from the start will help you be both more effective and ensure you remain compliant with grant requirements. Mapping out grant activities and associated requirements early in the project will provide direction for the project and make it easier for you to identify support needs or questions you may have. It will also suggest what kinds of records you will need to maintain and may help you determine what recordkeeping system might be the best approach for you. If you need assistance understanding grant requirements or would like suggestions for recordkeeping tools or templates that might be appropriate for your project, don’t hesitate to contact the Grants Office for help.

REPORTING

The granting agency will look forward to receiving reports about your progress. Reports can be required monthly, quarterly, semi-annually, or annually. The award documentation usually indicates how often a report is expected. As a condition of award, submitting complete and factually accurate reports on time is an important responsibility of the grant PI. Late or inaccurate reports can jeopardize not only the PI’s funding but that of other college projects.

PROGRAM REPORTS

The reporting schedule for your grant will be discussed at the Grant Kickoff Meeting. While you may also receive reminders from the Grants Office, it is the PI’s responsibility to ensure reports are completed and submitted on time. In some cases, submission of a grant report requires review and signature by a supervisor or the Authorized Organizational Representative (AOR) in the Grants Office. It’s important to plan ahead to prepare your reports, leaving plenty of time for data gathering, drafting, editing, review, and submission. For those grants not requiring AOR review and signature, the Grants Office still encourages PIs to make time to review your report with us prior to submission. It’s always good to have another set of eyes catch small errors or ask clarifying questions that will help portray your work clearly and in the best light. This may be especially true when the project is behind schedule or did not meet all its goals for the year. It’s important to remember that while project reports are a good opportunity to share all the great things you are achieving in your project, they are first and foremost compliance documents. Thoughtfully prepared reports provide the funder with an accurate view of the status of the project while also confirming the ability of the PI and the college to successfully carry out the project, even when there are bumps in the road.
Make sure to coordinate your report with Finance, since they will likely be submitting a financial report to complement your progress report or annual report. For continuation grants, the end-of-year (or annual) report is often used to review progress for the past year and highlight anticipated activities for the coming year. Funding for continuation awards is sometimes dependent on achieving satisfactory progress toward project milestones, as documented in the end-of-year report. For narrative reports containing fields in which any financial information is requested, please contact the Grants Office. We will request that information from Finance so we can verify congruence with the final reconciled amount they will be reporting.

While preparing reports about project accomplishments and outcomes, please be mindful of requirements about student privacy (see FERPA). In addition, always submit an electronic or paper copy of your completed report to the Grants Office. It will be placed in the official hard copy file kept for your grant along with many other compliance documents required for each award.

**Financial Reporting**

Grant Accounting strives to provide accurate and timely financial reporting, working with PI, Budget Managers, and the Grants Office. The following reports are provided:

- **Monthly Informational Reports** – Unless the grant has a monthly reporting requirement to the sponsor, these reports (including budget-to-actual expenditures) are provided as a status update to project managers and the Grants Office. If the grant requires match or a cost share, the match budget will also be provided.

- **Quarterly Financial Reports** – For grants with quarterly financial reporting requirements to the sponsor, a series of reports are provided including the budget to actual expenditures at the summary as well as the detail level. A project sign-off is requested of the Budget Manager before submitting the payment request to the sponsor. This same sequence will take place for grants with monthly financial reporting requirements.

- **Annual Grant Reporting** – For those grants with annual financial reporting requirements, Grant Accounting will prepare the annual reports or provide the necessary data to support the annual grant submission.

- **Match or Cost Share Documentation** – Grant Accounting is responsible for maintaining auditable financial records, as well as financial reporting if necessary, for identified match.

- **Other ad hoc financial reporting** as requested by the Project/Budget Manager or the Grants Office.
Generally, financial reporting is done through a separate process involving secure electronic systems used by authorized Finance staff. The PI’s role in financial reporting is to simply review and approve expenses on a regular basis and notify Finance of any errors or questions related to the monthly and quarterly financial reports they receive. Finance will then complete the financial reporting on the schedule specified by the funder using reconciled financial expense information pulled from our existing finance system.

**PROJECT CLOSE-OUT**

We hope the award provided an opportunity to implement activities that would not have otherwise been possible. Please note when the end date of a project occurs—particularly if it ends in the middle of a semester—and plan accordingly. Typically the college has a specified number of days after the grant end date to prepare final reports and complete other grant closeout activities. In addition to reporting, these may include disseminating or archiving materials produced under the grant, ensuring all deliverables are in hand (including those performed by subawardees or contractors), disposition of any equipment purchased under the grant, and closing any scholarship accounts at the Foundation that may have been created to award stipends or scholarships to students. At the point when all the final reporting has been completed and the final funds have been drawn down, the grant is officially considered “closed.”

For any grants requiring completion of specific close-out documents containing financial information, Grant Accounting will prepare these documents or provide the necessary financial information to complete these forms. As with routine reports submitted throughout the life of the grant, copies of any closeout documents should be submitted to the Grants Office to be placed in the official hard copy file for the grant.

**RECORDS RETENTION**

Both the federal sponsor and the state of Wisconsin specify requirements for retaining records related to grant awards. This is necessary in order to satisfy the period of time following grant close-out, during which a project may be audited under federal law, as well as to meet the requirements of state open records laws for public institutions. Generally, grant files need to be kept for a period of three years following the closeout date of an award for federal auditing purposes. However, Madison College policy relative to state records retention statutes require grant files to be retained for seven years following the project closeout date.

The long period for records retention does not mean the files need to be kept in your personal office space throughout the retention period. As with other College documents covered under records retention statutes, grant files can be archived and sent to storage following established college procedures. These include using official archive boxes, accurately
marking the boxes with the contents, the owner and the “destroy after date,” and contacting facilities to pick up the boxes and move them to the storage facility. Finance and the Grants Office also retain grant records for this period of time, and the Grants Office manages a database inventory listing the grant-related documents retained in storage. Please contact the Grants Office when you are preparing to send grant materials off to storage so we can update the inventory list and more easily locate items if they are needed at a later date. Following the state seven-year retention period stored grant files are destroyed, unless a later date for disposal is specified by the department that was responsible for the project.

A FEW CLOSING REMARKS

It takes teamwork to develop and manage a grant project. Careful and judicious management of a restricted project is critical to the success of all of the College’s grant programs. In assuming the role of a program manager, you are representing Madison College. It is therefore incumbent upon grant managers not only to meet the terms and conditions of the award agreement but also to meet the requirements of law, statutes, policies, procedures, and all pertinent regulations.

Implementing a grant project is serious business. It is also an accomplishment and provides enhanced services to our students and community that would otherwise not have been possible.
MADISON COLLEGE KEY CONTACTS

For technical assistance and guidance, Madison College staff is available to support project implementation.

Grants Office
- Phone: 608-246-6736
- E-mail: GrantsOffice@madisoncollege.edu
- http://madisoncollege.edu/in/about-office-grants-and-special-projects

Budget
- Phone: 608-243-4693
- E-mail: BudgetOffice@madisoncollege.edu
- http://madisoncollege.edu/in/contact-us

Finance
- Phone: 608-258-2955
- E-mail: FinResAdmin@madisoncollege.edu
- http://madisoncollege.edu/in/who-contact-o
- http://madisoncollege.edu/in/payments-reimbursements

Grant Accounting
- Phone: 608-258-2402
- E-mail: GrantAccounting@madisoncollege.edu

Accounts Payable
- Phone: Ext. 2055
- E-mail: AccountsPayable@madisoncollege.edu

Purchasing
- Phone: Ext. 2010
- E-mail: Purchasing@madisoncollege.edu
- http://madisoncollege.edu/in/contact-list
- http://madisoncollege.edu/in/purchasing-p-cards

Human Resources
- Phone: 608-246-6900
- E-mail: HR@madisoncollege.edu
- http://madisoncollege.edu/in/human-resources-generalists

Institutional Review Board (IRB)
- http://madisoncollege.edu/IRB
Madison College Foundation
- Phone: 608-246-6441
- E-mail: Foundation@madisoncollege.edu
- http://madisoncollege.edu/foundation-board-directors-staff

Legal Advisor
- Phone: 608-243-4448
- http://madisoncollege.edu/in/legal-advisor
Acronyms, Definitions, and Terms

Award – Funds provided by an external funding source for support of a project. This term applies to the original award and supplements.

CFDA – Catalog of Federal Domestic Assistance

Contract – Legal instrument by which a non-Federal entity purchases property or services needed to carry out the project or program under a Federal award. The term as used in this part does not include a legal instrument, even if the non-Federal entity considers it a contract, when the substance of the transaction meets the definition of a Federal award or subaward.

Contractor – An entity that receives a contract.

Cooperative Agreement – Legal instrument of financial assistance between a Federal awarding agency or pass-through entity and a non-Federal entity and is distinguished from a grant in that it provides for substantial involvement between the Federal awarding agency or pass-through entity and the non-Federal entity in carrying out the activity.

Cost-Sharing or Matching – Value of allowable non-federal contributions toward the allowable costs of a federal grant program or project. Such contributions may be cash or in-kind. Not every grant requires such resources.

D & B – Dun and Bradstreet

Disallowed Costs – Charges to a Federal award that the Federal awarding agency or pass-through entity determines to be unallowable, in accordance with the applicable Federal statues, regulations, or the terms and conditions of the Federal award.

DOD – Department of Defense or Department of Development

DOE – Department of Education

DOJ – Department of Justice

DOL – Department of Labor

DUNS – Data Universal Numbering System

Encumbrances – Obligations in the form of purchase orders, contracts, or salary commitments which are chargeable to an appropriation and for which a part of the appropriation is reserved. They cease to be encumbrances when paid, or when actual liability is established.

Executive Summary/Abstract – Brief written document highlighting the main findings and recommendations of a longer report/grant proposal.

F&A – Facilities and Administration

FAIN – Federal Award Identification Number

FICA – Federal Insurance Contributions Act

Fiscal Year (FY) – A twelve-month period to which the annual operating budget applies and, at the end of which, a governmental unit determines its financial position and the results of its operation. Madison College uses a July 1st through June 30th fiscal year. The Federal Fiscal Year is October 1st through September 30th.

FR – Federal Register

Fringe Benefits – Compensation in addition to regular salary or wages provided to an employee. This may include health and dental insurance, Social Security, retirement and disability insurance.

FTE – Full-time equivalent
Grant Approval Form – A document signed by the PI, the PI’s supervisor and the appropriate Vice President, authorizing the Grant Office to work on the proposal and submit it to the funder. This document insures that the work of the grant is in alignment with the college priorities and that the PI is approved to work on the grant should it be funded. Appropriate signatures on this form are required before grants can be developed and submitted.

IHE – Institutions of Higher Education

Indirect Costs – Costs that have been incurred for common or joint objectives and cannot be readily identified with a particular final cost objective. Examples of such costs are college wide expenses for utilities, insurance, grounds, etc. The value of these services and the amount able to be charged to grants is negotiated by the College with the Federal Government. Contact the Grants Office to secure the latest indirect rate. Also note that some grant applications have limits on how much indirect cost can be charged to the grant regardless of the rate the College has negotiated. Indeed, Foundations often disallow any Indirect Costs. The Grants Office will help PI’s to determine the appropriate amount as the budget is prepared.

IRB – The Institutional Review Board is a committee, comprised of faculty and staff from diverse backgrounds and a community member, that reviews research protocols involving human subject participants to ensure that the rights of the participants are protected, that they are not subject to unreasonable harm (physical and emotional), and that information about them is kept confidential.

Letter of Intent – A letter from the College to the funder, required before the application is due, indicating the intent of the College to submit an application. This does not obligate the College to submit, but it alerts the funder as to how many applications are likely to be submitted. Beware of and do not sign any Letter of Intent that creates any obligations for the College!

Letter of Support – A letter from a partner or supporter of the college urging the agency to fund the application. These letters can have slight impact depending on the funders who usually prefer Letters of Commitment which indicate a more significant involvement in the grant implementation.

Letter of Commitment – A letter from a grant partner indicating their role in the proposal and the resources they will bring to implementation. These letters are often required and can have a great impact on the probability of funding. Most successful grant applications have significant partner involvement as documented in Letters of Commitment.

Modified Total Direct Cost (MTDC) – All direct salaries and wages, applicable fringe benefits, materials and supplies, services, travel, and subawards and subcontracts up to the first $25,000 of each subaward or subcontract (regardless of the period of performance of the subawards and subcontracts under the award). MTDC excludes equipment, capital expenditures, charges for patient care, rental costs, tuition remission, scholarships and fellowships, participant support costs and the portion of each subaward and subcontract in excess of $25,000. Other items may only be excluded when necessary to avoid a serious inequity in the distribution of indirect costs, and with the approval of the cognizant agency for indirect costs.

MOU – Memorandum of Understanding

NSF – National Science Foundation

OMB – Office of Management and Budget (Federal)
**Pass-through Entity** – A non-Federal entity that provides a subaward to a subrecipient to carry out part of a Federal program.

**PeopleSoft (PS)** – Madison College’s enterprise software system

**PI** – Principal Investigator, Project Manager, and Grant Manager are used interchangeably and have the same meaning

**RFA** – Request for Action

**RFP** – Request for Proposal

**RFQ** – Request for Quote

**SAM** – System for Award Management

**SPOC** – Single Point of Contact

**Subaward** – An award provided by a pass-through entity to a subrecipient for the subrecipient to carry out part of a Federal award received by the pass-through entity. It does not include payments to a contractor or payments to an individual that is a beneficiary of a Federal program. A subaward may be provided through any form of legal agreement, including an agreement that the pass-through entity considers a contract.

**Subrecipient** – A non-Federal entity that receives a subaward from a pass-through entity to carry out part of a Federal program; but does not include an individual that is a beneficiary of such a program. A subrecipient may also be a recipient of other Federal awards directly from a Federal awarding agency.

**Sustainability** – Refers to the continued existence or ability to maintain a project after the government funds expire.

**WorkDay** – Workday is an enterprise business service software application that integrates human resources, payroll, finance, and purchasing. It delivers these applications in a cloud model that allows people to work collaboratively in a real-time environment that is accessible to every member of Madison College.

**Workforce Advancement Training Grant Funds (WAT)** – State grants awarded to technical colleges for worker skills training.

**WDB** – Workforce Development Board

**WTCS** – Wisconsin Technical College System

*Any inquiries, errors, or corrections should be sent to: grantsoffice@madisoncollege.edu*
APPENDIX A – ROLES AND RESPONSIBILITIES

GRANTS OFFICE RESPONSIBILITIES

PRE-AWARD

Development
- Identify and disseminate information about funding opportunities from external funding sources.
- Assist with project conceptualization and development.
- Collaborate with content expert(s) to develop a fundable project plan, proposal, and budget.
- Initiate requests to sponsors regarding pending and awarded projects.

Preparation of pre-proposals, proposals, and contracts
- Review and analysis of agency program guidelines.
- Review and comment on drafts of pre-proposals and proposals.
- Facilitate the preparation of standard contracts and sub-contracts.
- Acquire all internal reviews, sign-offs, and institutional certifications.

Budget Development
- Development of itemized and summary budgets.
- Application of appropriate salary, fringe, and indirect cost rates.
- Completion of agency budget forms.

Grant Submission
- All grants are officially submitted through the Grants Office after all reviews and sign-offs are completed. All information is uploaded and submitted by the Grants Office as staff in the Grants Office serve as the Authorized Organizational Representative (AOR) that can submit applications on behalf of the College.

POST SUBMISSION (PRE-AWARD)
- The Grants Office will notify Grant Accounting, the PI, Budget Manager, Dean, and Associate Dean that the grant application was submitted and received by the sponsor.
- The external review process can be as short as 1 month or as long as 12 months. Sometimes the PI will be asked to submit additional information or to amend the budget. Should this happen, contact the Grants Office as any changes to the original submission must be reviewed, approved, and documented.

OFFICIAL NOTIFICATION OF GRANT AWARD
- Negotiation, execution, and modification of contracts
- Receipt and processing of the Notice of Award
• The Grants Office is responsible for reviewing all grant or contract terms and facilitating legal review before accepting awards.

• Madison College receives a Notice of Award from the sponsor via email, fax, or mail. If no changes are needed, the Grants Office communicates via the GrantsOffice@madisoncollege.edu e-mail to Grant Accounting, the Principal Investigator, Budget Manager, Associate Dean, and Dean.

• After the award is signed and communicated, the Grants Office will schedule a kickoff meeting to prepare for the grant implementation phase.

**Post Award**

• All program and budget revisions need to begin with the Grants Office. These include prior-approval requests/notifications (i.e. permission to carry forward funds, change of PI, change of scope, major re-budgeting and no-cost extensions and change in staffing plan). Please see the Budget Revision policy for more information on the budget revision process.

• The Grants Office provides technical assistance to PIs and Budget Managers in interpreting allowability of grant activities, programmatic reporting, grant-specific administrative requirements, participant eligibility guidelines, navigation of college systems (including facilitating the approval of contracts if needed) and other areas of grant administration as requested.

• The Grants Office assists with managing the time and effort process at the college. This includes providing training on the time and effort reporting process and assisting departments in developing a process that is efficient and compliant.

• The Grants Office convenes periodic meetings to review grant progress, spending, and compliance topics with PIs and Budget Managers.

**College Grant Stakeholder Responsibilities**

The Principal Investigator’s responsibilities may be divided into two related but distinctly different sets of activities: those activities involving the management of the work of the project, and the responsibility of spending project funds. While the work of the project should drive the financial activities, sound management practices in both arenas are required. The financial stewardship of grant funds is a shared responsibility between the Grants Office, the PI, the Budget Manager, and Grant Accounting.

**Role of Principal Investigator (PI) within Madison College**

The PI is the lead person who is responsible for the design, administration, and reporting for the project activities.

The PI is responsible for:

• Fully understanding the grant and its accompanying terms and conditions

• Ensuring programmatic success & achievement of all goals and objectives

• Ensuring that all expenditures are allowable, in collaboration with the Grants Office as necessary
• Maintaining records suitable for audits
• Recognizing and initiating corrections to expenses booked to the grant in error
• Submitting all required programmatic reports by specified deadlines
• Facilitating communication among all stakeholders
• Tracking of all restrictions placed on the expenditure of funds by the agency
• Initiating budget modifications as necessary with the Grants Office
• Working in partnership with the Dean and Associate Dean to develop a sustainability plan to determine if there are grant activities that should be continued after the grant ends and to identify funding to support these activities

It is the responsibility of the PI to monitor the day-to-day fiscal performance of the project and carry out the technical aspects of the project.

ROLE OF THE GRANT BUDGET MANAGER WITHIN MADISON COLLEGE

Sometimes the Budget Manager has the authority to approve expenditures and sometimes they review prior to approval

The Budget Manager is responsible for:
• Initiating hiring process or salary allocation changes following Madison College process
• Initiating process to purchase equipment (if needed) & supplies
• Tracking of restrictions placed on the expenditure of funds by the agency
• Approving budget modifications initiated from the Grants Office
• Approving time and labor
• Approving travel requests and claims, purchase orders, and P-card purchases as required
• Assisting with facilitating the closeout process including completing required reports and storing records
• Reviewing and approving internal financial reporting of expenditures, prior to submission to the sponsor

Although some of the responsibilities assigned to the Associate Dean and Dean vary by school, the following responsibilities fall within the respective school administering a grant and typically would be performed by someone serving as the Dean or Associate Dean.

ROLE OF THE DEAN AND/OR ASSOCIATE DEAN WITHIN MADISON COLLEGE
• Assisting with developing a strategic framework for how grants might support the strategic direction of the school and integrate activities when appropriate
• Securing in-kind or cash match if such funds are needed to fulfill grant requirements
• Supervising staff, faculty, and student workers and ensuring that staff is trained and that employees follow policies and procedures
• Ensuring compliance with Federal, State and Local laws, regulations, codes, and/or standards
• Supervising full-time faculty and staff working on a grant
• Developing a vision for the direction of the school, including how grants might support that vision
• Assisting with hiring staff and faculty who will fulfill the objectives outlined in the grant
• Initiating salary allocation changes through position requisition process at the beginning of each semester or as needed to ensure alignment with approved budget and after the fact time and effort reporting
• Working in conjunction with the Program Chair and PIs to facilitate backfill plans to maintain consistent instructional offerings
• Assisting PIs and Budget Managers in resolving issues or navigating through the college system in order to successfully implement project
• Assisting with the development and support of awarded grants
• Approving payroll adjustments processed in error
• Managing and overseeing staff, faculty, and student workers, including ensuring staff are trained and that employees follow policies and procedures
• Assisting with hiring staff and faculty who will fulfill the objectives outlined in the grant
• Supervising part-time faculty working on a grant

ROLE OF THE PROGRAM CHAIR WITHIN MADISON COLLEGE
• Collaborating on vision development for the direction of the program, including how grants might support that vision
• Collaborating on program operating budget to ensure costs associated with backfilling instructors working on grants is allocated correctly

ROLE OF GRANT ACCOUNTING WITHIN MADISON COLLEGE

Establishing Budget Authority – (within the College's financial accounting system)
Upon notification from the Grants Office of an approved grant award, Grant Accounting will do the following:

• Map the approved grant award budget to an appropriate accounting structure (i.e. accounts, departments, program, etc.) that align with both the College’s financial policies and control systems; as well as meets all WTCS, federal and state reporting regulations.
• Establish project number and assign and load the accounting structure and budget authority into the financial accounting system.
• Disseminate accounting structure to key stakeholders, including project managers, budget managers, Grants Office and other Grant Accounting staff.

The same process would apply to any subsequent budget revisions or no-cost extensions to the original grant award.
Financial Reporting
Grant Accounting strives to provide accurate and timely financial reporting, working with PI, budget managers and the Grants Office. The following reports are provided:

- Monthly informational reports – unless the grant has a monthly reporting requirement to the sponsor, these reports including budget to actual expenditures are provided as a status update to project managers and the Grants Office. If the grant requires match or a cost share, the match budget will also be provided.
- Quarterly Financial Reports – For grants with quarterly financial reporting requirements to the sponsor, a series of reports are provided including the budget to actual expenditures at the summary, as well as the detail level. A project sign-off is requested of the budget manager before submitting the payment request to the sponsor. This same sequence will take place for grants with monthly financial reporting requirements.
- Annual Grant Reporting – For those grants with annual financial reporting requirements, Grant Accounting will prepare the annual reports, or provide the necessary data to support the annual grant submission.
- Grant Close Out Documents – For any grants requiring close out documents, Grant Accounting will prepare the close out documents, or provide the necessary data to support the grant close out documents.
- Match or Cost Share Documentation - Grant Accounting is responsible for maintaining auditable financial records, and financial reporting if necessary, for identified match.
- Other ad hoc financial reporting as requested by the project or budget manager, or the Grants Office.

Invoicing and drawdown
- Grant Accounting is responsible for invoicing to funders and drawdown of funds according to grant award conditions.
- Additionally, Grant Accounting will liaise with funding agencies when adjustments or corrections are needed with invoicing or drawdown.

Grant Accounting as a Resource
Grant Accounting is available to project managers and the Grants Office as follows:

- Attend various grant related meetings, including grant kick-off meetings, site visits by sponsors, periodic grant status meetings, other meetings as necessary
- Serve as a resource to PIs, budgets managers and the Grants Office in the following areas:
  o Development of the design of an accounting structure that will result in the data necessary to track and manage the grant budget vs. actuals, and support the required financial reporting to the sponsor.
  o Trouble-shooting and problem resolution
  o Assist/provide direction as to the recommended method for the correction of errors.
  o Assist in the interpretation of various federal, state, other regulations.
Audits

- Grant Accounting serves as lead for the College’s Annual Single Audit
- Grant Accounting provides financial support for other audits by sponsors or other regulatory agencies.

Maintain Certifications and F & A Rate Calculation/Negotiation

- Grant Accounting is responsible for assuring that the College’s certification in Sam.gov remains current.
- Grant Accounting is responsible for calculating and submitting the College’s Facilities & Administration rate proposals, with review by the Grants Office. Grant Accounting will also negotiate the rate provided by the cognizant agency where appropriate.
APPENDIX B – BUDGET REVISION POLICY

REVISING GRANT BUDGETS

As a grant project proceeds, it is not uncommon that changes will need to be made to the budget so that spending remains in alignment with grant activities and changing circumstances. It is important to know that all funders have specific guidelines about which changes require a budget revision and/or formal approval, as well as have varying requirements related to specific items or changes within the budget. Additionally, there are situations where the funder may not require a formal revision but college policy requires an internal budget revision to ensure appropriate budget authority can be allocated and communicated through our financial and human resources/payroll systems.

Budget Revision Rationale and Overview of Process

• The need to revise the budget on a grant is most often driven by positions that go unfilled for a period of time or changes in the activities needed to achieve project outcomes. It is critical that principal investigators (PIs) contact the Grants Office as soon as possible after the need for revisions becomes apparent. Grants Office staff will work with the PI to determine if proposed changes are permitted, to create a crosswalk between the revised activities and the appropriate budget items, and to identify the funding agency’s threshold for when a revision is required and the process for submitting it.

• To start this process, PIs should contact the Grants Office with the following information:
  o The name of the grant;
  o The nature of the proposed change;
  o The justification for the change;
  o The result of the proposed change (i.e. names of replacement personnel, new budget items, revised work plan, etc.)

• The Grants Office will work with you to ensure the PI’s revision is in compliance with sponsor regulations and college grant management policies. These may include but are not limited to:
  o A requirement of sponsor permission if a modification exceeds a certain amount or affects a specific category (e.g. for WTCS grants, any movement of funds between budget lines that causes a change of 20% or more in the receiving line needs to be submitted for official approval).
  o Notification to the sponsor if the modification reflects a change in key personnel, implementation or scope of the project.
  o Re-costing personnel using accurate salary and fringe information
  o Assisting with budget projections, costing and scenarios.
Budget Revision Process Specifics

Requirement for Notifying a Grant Sponsor

- If the nature of the modification requires sponsor notification or approval, the Grant Office works with the PI to prepare the necessary documentation. The Grants Office submits the modification documents to the funding agency and notifies the PI, budget manager and Grant Accounting.

- If at the time a budget revision is submitted there is a need for interim budget authority to continue to carry out project activities while awaiting funder approval of the modification, the Grants Office will work with the PI, Budget Manager and Grant Accounting to determine allowable adjustments within the current budget. If approved, the Grants Office sends notification of approval to the PI, budget manager and Grant Accounting. Grant Accounting then updates the revised budget in the PeopleSoft Finance system.

- Notification of the revised budget and chart fields are emailed to the PI, budget manager and the Grants Office. If the modification is denied by the sponsor, the grant development staff works with PI to develop alternative plans.

Grant Modifications Not Requiring Sponsor Approval

- If the nature of the modification does not require sponsor notification or approval, the Grants Office works with the PI to prepare an internal budget modification.

- The Grants Office notifies the PI, Budget Manager and Grant Accounting of the internal budget modification. Grant Accounting then updates the revised budget in the PeopleSoft Finance system.

- Notification of the revised budget and chart fields are emailed to the PI, budget manager and the Grants Office. This process ensures that the budget of record, the budget as reflected in PeopleSoft Finance, and the actual project activities stay in alignment and remain auditable.
Grant Modifications Requiring Communication with the Grants Office

- Any changes to the approved staffing plan or time and effort regarding a grant, even if the change does not require a formal budget revision to the funder, must be communicated to the Grants Office.

- This assists the Grants Office in determining if any steps are necessary beyond completing an internal budget revision. For example, the Grants Office can assist PIs with ensuring all necessary steps have been taken in terms of college HR processes (e.g. position requisitions in cases of changed funding source or percent effort allocated for positions). Please communicate such changes via email to GrantsOffice@madisoncollege.edu

- If in doubt, call the Grants Office. Keeping us up-to-date on the status of your project helps us provide you with better support and may streamline some of the work of managing your grant dollars.
APPENDIX C – GRANT-FUNDED POSITIONS

Originally Issued: 6/20/14
Procedure Owner: Emily Sanders, Grants Office
Contributors: J. Bentley, Payroll Office; A. Brown, Grants Office; B. Laufenberg, Budget Office; D. McKay, Grants Office; J. Nelson, Grant Accounting; D. O’Rourke, Provost’s Office; J. Pahl Washa, Human Resources; T Werhane, Learner Success
Approval: Tim Casper, Senior Executive/Special Assistant to the President

CONTENT

1. Purpose
2. Process Description

PURPOSE
The purpose of this policy is to clarify the process that should be followed when a position is funded either in part or entirely through a grant. Adherence to this policy will ensure consistency in College processes, improve grant compliance and ensure that funding is available.

PROCESS DESCRIPTION

Development → Implementation → Closeout

Grant Development Phase
When a grant is developed, staff might be needed to fulfill grant activities. If new positions need to be created, the Principal Investigator (PI) and supervisor will describe the duties and qualifications needed for the position(s). These duties are forwarded to the HR Liaison (One of the HR Business Partners designated to support the Grants Office) to determine the job category and an estimate of the classification. After the job classification is estimated, the Grants Office develops the budget using the midpoint of the range for that position. The position may need to go through the formal classification process once the grant is awarded.

After a grant is submitted and approved, the Grants Office forwards the approval letter to Grant Accounting.
Grant Implementation Phase
Once the grant is awarded, the Grants Office will forward to Grant Accounting the approved budget, including the staffing plan. Grant Accounting establishes project and budget authority in PeopleSoft Finance (PS) (assigns project #, writes combo edit, runs build, posts budget detail in following ledgers: Standard Budget & Detail within Commitment Control).

Grant Accounting notifies the PI, supervisor, grant budget manager, and the Grants Office of grant budget establishment and chartfield/worktag detail. The email includes a summary of the chartfields/worktag and budget detail for the grant. The budget is loaded into PS Finance and chartfields/worktags are created for personnel listed in the grant.

The hiring manager is responsible for completing the position requisitions as necessary. A position requisition (PR) must be completed if any of the following changes occur:

- Funding/budget change and position chartfield/worktag change (as a result of other indicated changes)
- Position Status of Regular or Temporary employee
- Expected End Date
- Full/Part Time status
- Position Type: PSRP, Admin, FT Faculty
- Supervisor (Reports To)
- Location Code
- Working Title
- Change in total annual hours

Please note in the PR if there is going to be a backfill and what the plan is (part-time, full-time, new hire) and include any other detail you may feel would be helpful to the review/approval process. (See more detail on Backfill plans below.)

Many faculty members working on grants have salary allocations that change each semester (fall and spring) and require new position requisitions each semester.

For new positions, HR creates the position number once the PR is approved by the President’s Cabinet. Payroll is notified of the position number via the workflow system. Payroll updates tables with chartfield/worktag allocations provided by the Budget Office.

Once payroll is paid to a grant supported position the commitment accounting process is run and the costing is posted to the general ledger.
Backfill Plan
The supervisor will work out a backfill strategy, when needed.

If the backfill strategy requires the enhancement of a part-time faculty position temporarily to full-time status, the supervisor will determine, with the help of the Provost’s Office, the funding source for the additional enhancement costs that are not covered by the grant. A PR will be initiated by the supervisor for the enhancement and the PR will go through the regular approval process.

If a part-time backfill is needed, a request should be made to the Budget Office via email (cc: GrantAccounting@madisoncollege.edu), with the actual or estimated amount that would need to be transferred, the chartfields/worktags (to/from), the employee name and who they are backfilling for.

Other Scenarios to Consider
If a full-time faculty is to be paid temporarily from another budget department, a PR should be initiated before and after the assignment to adjust budget salary accounting accordingly. If faculty should be paid out of another department for work above their full-time load (curriculum development, additional assignment, etc.), the Department would initiate a new job record in the part-time data entry system. This information is saved and routed to the supervisor for electronic approval. After it is approved it is routed to HR and it is moved into the HR payroll record.

If a PR needs to begin prior to receiving a notice of grant award, the Grants Director will provide written approval from the Vice President responsible for managing the grant with an approved chartfield/worktag in the event that the grant funding is not received.

The classification process is not dependent on the PR and can begin at any point in order to expedite the hiring process.

Summer session
Each School completes a spreadsheet detailing faculty summer assignments. This spreadsheet contains a column to indicate if the assignment is grant funded. Payroll will send notifications of revisions to the Grants Office.

Overload Process
If a grant-funded course assignment is made to a full-time faculty member that is above load, the supervisor will complete an overload request form and include the grant name and chartfield/worktag alongside the course overload information and send it through the approval process. The Provost’s office will share overload assignment information with the Grants Office and Grant Accounting once received.
Grant Closeout Phase
As part of the grant closeout process, Grant Accounting will deactivate chartfields/worktags associated with the grant.
Please Note: As directed by Section 200.320 of the Uniform Guidance, the $3,000 micro purchase limit for grant funded purchases is lower than the general college threshold of $5,000.

Procurement & Purchasing Procedures

Procedure #P100 - Procurement & Purchase of Goods and Services

Contact Person: Controller

Goal: The responsible & ethical procurement of high quality goods and services at the lowest cost in compliance with all relevant laws, statutes and regulations.

Delegation: The Procurement Department is responsible for administering the district’s procurement policy and monitoring activities to ensure compliance. All Request for Bids (RFB) and Request for Proposals (RFP) are administered through the Procurement Department to ensure that the process complies with all applicable laws and regulations, including the requirements of the WTCS Financial Accounting Manual.

Purpose: This policy provides instruction for the purchase of necessary materials and services and identifies the essential activities and primary responsibilities of the procurement function. All procurement staff and their designees or delegates must adhere to this policy.

Scope & Responsibility: Procurement related activities may be assigned to either procurement staff or district employees outside of the Procurement Department and include:

- Determining needs, specifications & deliverables
- Evaluating proposals and documenting rationale for selection
- Determining and executing purchases, using the most appropriate purchasing method
- Receipt and inspection of goods or acceptance of service deliverables
- Follow up and resolution with vendors regarding any discrepancies in price, damages or shortages on incoming material
- Approval of payments

General Requirements:

- Purchase orders require the approval of the appropriate departmental supervisor and the confirmation of available budgetary funds.

- A purchase order or a District Credit Card must be used for the procurement of goods and services. The Madison College Purchasing Matrix outlines allowable purchasing
methods for dollar thresholds.

- The District shall not discriminate against any vendor, business or individual who offers to provide goods or services on the basis of age, race, color, sex, creed, disability, political persuasion, ancestry, sexual orientation, or for any other reason prescribed by law, whether federal, state, or local ordinance.

- The District will dispose of property which is no longer useful or needed for programs or operations in conformance with guidelines outlined in the Disposition of College Property Procedure. For each item with an estimated value of $25,000.00 or more, the District must submit a list to the State Director of the WTCS for approval to dispose of the property.

- The only persons who are authorized to sign contracts on behalf of Madison College are the President, any position at the level of a vice president, or any individual designated by the President and as outlined in the corresponding Administrative Policy #103. Legal will review contracts on a case by case basis to determine the acceptable risk level, and determine if further negotiation is necessary, whether by legal or by the business manager.

Purchase Thresholds:

- Splitting large purchases into smaller purchases in order to bypass procurement rules is prohibited.

- All Purchases must comply with the dollar thresholds as noted, unless outlined in the Bid Waiver Section below.

- District Board approval is required for sole source procurements of $50,000 or more. A sole source is an item or service that is only available from a single source. [Wisconsin Administrative Code TCS 6.05(2)(d)]

- All procurements for printing services greater than $250 and less than $25,000 shall require at least two quotations, since printing costs can vary substantially between vendors. Printing procurements of $25,000 but less than $50,000 require three written quotes. Any printing procurements of $50,000 require request for bids.

- Other Non-Construction Related Purchases:
  - Total Cost is less than $5,000; may be obtained at buyer discretion. Two quotes are recommended. [Madison College Policy]
  - Total cost is at least $5,000 but less than $25,000; requestor needs written price quotations from at least two sources. The lowest price for the best quality should be used to determine the vendor. [Madison College Policy]
  - Total cost is at least $25,000, but less than $50,000; written quotations from a minimum of three vendors is needed. [Wisconsin Administrative Code TCS 6.05(2)(f)]
  - Total cost of $50,000 or more; requires a competitive sealed bid process, via either Request for Bid or Request for Proposals. [Financial Accounting Manual]
Public Construction Related Purchases:

- **Total cost is less than $5,000;** may be obtained at buyer discretion. Two quotes are recommended. [*Madison College Policy*]

- **Total cost is at least $5,000 but not exceeding $25,000;** requires the publication of a class 1 notice of the proposed construction prior to execution of the contract. A minimum of two quotes are required. [*s62.15 (1) Wis. Statues*]

For construction projects where total costs are anticipated to be less than $25,000, the administration shall, whenever possible, give preference to contractors and subcontractors who certify that they participate in a registered apprenticeship program.

- **Total Cost is greater than $25,000;** requires the publication of a class 2 notice to inform potential bidders of the proposed construction and a sealed bid process. Construction bids must include the time, date and location of the public bid opening and at least two district employees shall be present. [*Financial Accounting Manual*] [*Wisconsin Statutes 38.18, 62.15(3) and 62.15(1)1, (11), and (14)] [*Wisconsin Administrative Code TCS 6.05 (2) (c)*]

All contracts for public construction where total costs are anticipated to exceed $25,000 must include the following clause;

“The contractor(s) and any subcontractors shall participate in a registered apprenticeship program, certified through the Department of Workforce Development, Bureau of Apprenticeship Standards, and/or the U. S. Department of Labor, Bureau of Apprenticeship and Training, and shall employ apprentices for each building trades craft anticipated to be involved in the project, if they are available and appropriate for the nature of the work being performed. Such apprentices shall be properly indentured in a registered apprenticeship program.”

**General Requirements for Request for Bids & Request for Proposals:**

- All bids and proposals shall include a clear and accurate description of the item or service being procured. This description shall not contain features that unduly restrict competition.

- Evaluation criteria related to bids & proposals will be disclosed in the specifications of the documents provided to all prospective bidders. [*Wisconsin Administrative Code TCS 6.05(2)(l)*]

- Two or more responsible and willing suppliers are willing and able to compete.

- Awards shall be made only to responsible contractors that possess the ability to perform successfully under the terms and conditions of the proposed procurement.

- Procurement contracts may be awarded for periods up to 5 years, with the option of
additional consecutive one year extensions up to a maximum of total contract length (including extensions) of seven years. Exceptions include audit services (restricted to 5 years total) and ERP system maintenance agreements (contracts limited to ten years total), and legal services (annual engagement letter).

**Bid Waiver Exceptions:** The following are allowable exceptions to the bid/quote requirements listed above:

- Any purchase made under a bid waiver exception must be executed using a purchase order or a District Credit card and must comply with all general purchasing requirements as stated above.
- Cooperative Purchasing under s.16.73 & s66.0301 of the Wis. Statutes is utilized.
- The purchase is made through a cooperative purchasing association which has a competitive purchasing process that is substantially the same as the competitive procurement requirements applicable to the WTCS and that have been recognized by the System President.
- The Purchase is from another governmental unit without intervention of bids per s. 66.0131 (2) Wisconsin Statutes.
- After solicitation in a competitive procurement, competition is determined to be inadequate.
- Used Equipment from a vendor who offers it for immediate sale may be through noncompetitive negotiation. [*Financial Accounting Manual*]
- Items intended for Resale.
- Emergency Procurements can be made when there exists a threat to the continued operation of the District or to the health, safety, or welfare of students, employees or residents of the District. Emergency procurements shall be evidenced by a written determination of the basis of the emergency and the selection of a particular contractor. [*Wisconsin Administrative Code TCS 6.05 (2) (i)*]
- Outside Legal Counsel: An annual letter of engagement is required.
- Sole Source: The item or service is only available from a single source.
- Real Estate Leases.
- Copyrighted materials.
- The following services are considered professional services or are specifically identified in board-approved collective bargaining contracts, and therefore are procured through non-competitive selection: Collectively bargained items, Health Insurance, Cafeteria Plan Benefits Administrator, Water, Sewer, Electric, & Gas Utilities, Telephone Service, Contracted instruction for customized training where the contracted instruction is requested by customer, and Subcontractors identified in grants where the federal grantor agency specifically authorizes noncompetitive negotiation.
- For instructional equipment, when key employers in the district require that potential employees be trained on a specific brand of equipment, the district is authorized to procure that brand.
**Annual Review:** Annually, district staff shall prepare a review of all procurements of $50,000 or less of similar goods, supplies, or services that total $50,000 or more in aggregate to determine if a more competitive process should be used in the future. The district board shall take formal action by October 31 on the procurement review and report related to the prior fiscal year. Such action is to be reflected in the board minutes. [Wisconsin Administrative Code TCS 6.05(2)(h)]

**Monthly Review:** The District Board shall review all checks over $2,500 for purchases from a state/governmental contract as required in the WTCS Financial & Administrative Manual.

**Code of Conduct:** Any employee engaged in the award and administration of procurement is prohibited from having a financial interest in any procurement and any employee involved in procurement is prohibited from receiving any gift, gratuity or other financial gain from any contractor. [Wisconsin Administrative Code TCS 6.05 (2) (b)] Human Resources Code of Ethics Policy #406 (This language specific to purchasing must be added to this policy in order to be in compliance with WTCS)

**Recordkeeping Requirements:** The District shall keep records for all procurements where the total cost exceeds $25,000.00. These records shall include the rationale for the method of procurement, the rationale for selection or rejection of any contractor or proposed contractor and the basis for cost or price. The District shall keep records identifying sole source and emergency procurements, including the specific rationale used to meet the criteria.

**Adherence to Federal Regulations:** All federally funded procurements shall be made in accordance with applicable federal regulations.

**Audit:** The Procurement Department will ensure that appropriate internal control procedures and safeguards are in place for all activity related to the procurement process and will monitor & audit activity related to purchasing. Periodic audits and reviews of purchasing records will be done by an independent audit firm to ensure their proper accounting and compliance with District Policy.
## APPENDIX E – MADISON COLLEGE PURCHASING MATRIX

<table>
<thead>
<tr>
<th>Row</th>
<th>Purchase Dollar Threshold</th>
<th>Allowed Purchasing Methods</th>
<th>Approving Authority</th>
<th>Competitive Purchasing Process Requirements</th>
<th>Required Documentation</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Purchases under $500**</td>
<td>P-card, or</td>
<td>Employee as Authorized by Budget Manager for invoices &amp; P-Card</td>
<td>Two Written Quotes for Printing are required</td>
<td>For Printing Purchase Orders, quotes are to be uploaded into the PeopleSoft Purchase Order System</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Submit invoice with written authorization, Vendor ID and Chartfield *, or</td>
<td>Budget Manager for Purchase Orders</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Approved PeopleSoft (PS) Purchase Order (Required for Printing)</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>2</td>
<td>Purchases Between $500 and $4,999**</td>
<td>P-Card, or</td>
<td>Budget Manager</td>
<td>Two Written Quotes for Printing are required</td>
<td>For P-Cards, include quotes in Monthly Statement Submittal</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Approved PeopleSoft (PS) Purchase Order (Required for Printing)</td>
<td></td>
<td>Two Written Quotes for all other Purchases are recommended</td>
<td>For Purchase Orders, quotes are to be uploaded into the PeopleSoft Purchase Order System</td>
</tr>
<tr>
<td>3</td>
<td>Purchases Between $5,000 and $24,999**</td>
<td>Approved PeopleSoft (PS) Purchase Order</td>
<td>Budget Manager</td>
<td>Two Written Quotes are required</td>
<td>Two Written Quotes, or a completed and approved Waiver form, must be uploaded into the PeopleSoft Purchase Order System</td>
</tr>
<tr>
<td>4</td>
<td>Purchases between $25,000 and $49,999**</td>
<td>Approved PeopleSoft (PS) Purchase Order</td>
<td>Budget Manager for Non-Public Construction Purchases</td>
<td>Three Written Quotes are required</td>
<td>Three Written Quotes, or a completed and approved Waiver form, must be uploaded into the PeopleSoft Purchase Order System</td>
</tr>
<tr>
<td></td>
<td></td>
<td>For Public Construction Purchases, VP Level Approval &amp; District Board Approval is needed</td>
<td></td>
<td>For Public Construction Purchases, a sealed bid process and a Class 2 Notice is also required</td>
<td>For Public Construction, a sealed bid process and publication of a Class 2 notice is required. Include the Approved Issue Paper and the RFB Number with the PO</td>
</tr>
<tr>
<td>5</td>
<td>Purchases $50,000 and over**</td>
<td>Approved PeopleSoft (PS) Purchase Order</td>
<td>VP Level Approval &amp; District Board Approval is needed unless Purchase is from a Cooperative Contract, where the Budget Manager may Approve</td>
<td>Requires Request for Bid(RFB)/Proposal(RFP) Process</td>
<td>Bid Responses, or a completed and approved Waiver form, must be uploaded into the PeopleSoft Purchase Order System. Include the Approved Issue Paper and the RFB Number with the PO</td>
</tr>
</tbody>
</table>

* Conferences, memberships, registrations, resale, postage, utilities, advertising, temporary services, international student housing and payroll-related purchases in excess of $500 are also OK to pay off invoices if P-cards are not accepted.

**All purchases of instructional learning materials such as multi-media & video material must be in an accessible format (captioned) to comply with Administrative Policy #207 Procurement & Purchasing.
**PeopleSoft Purchase Order Process:**

1. The PO Enterer enters a PO for the material or service purchase with a valid Chartfield and sufficient budgetary funds.
2. The Budget Manager reviews & approves the PO and it routes to Purchasing for final approval.
3. Purchasing reviews the PO, ensures proper documentation and provides final approval.
4. Purchasing issues the PO to the vendor. **Employees are not authorized to place orders prior to Purchasing final authorization.**
5. Any Invoices associated with a PO must be submitted to Accounts Payable with proper signature authority and a valid Chartfield with sufficient funds.

**Submitting Invoices to Accounts Payable not associated with a Purchase Order (P.O.):**

<table>
<thead>
<tr>
<th>Amount of Invoice</th>
<th>Written Authorization Required</th>
<th>Required When Submitting an Invoice to A/P:</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Invoice less than $500</td>
<td>Employee as authorized by Budget Manager/Dean</td>
<td>1. Chartfield must be specified and have sufficient funds.</td>
</tr>
<tr>
<td>2. Invoices over $500 for Conferences, memberships, registrations, resale, postage, refunds, utilities, advertising, temporary services, international student housing and payroll related</td>
<td>Budget Manager</td>
<td>2. Email or signature authorization required.</td>
</tr>
<tr>
<td>3. Invoices equal or greater than $500 (other than exceptions noted in line 2)</td>
<td>Vice President or Cabinet Member for the applicable department</td>
<td>3. Note PeopleSoft Vendor ID on the invoice.</td>
</tr>
</tbody>
</table>

**Note:** Accounts Payable will promptly return any invoices that do not comply with these requirements to the requester unpaid until these requirements are met.
APPENDIX F – TIME AND EFFORT POLICY

Time and Effort Reporting Guidance

This document provides an overview of time and effort (T & E) reporting as required of educational institutions that receive federally funded grants. It includes:

- the minimum requirements for maintaining time and effort and the reasons why it is necessary
- information about who is responsible for maintaining this information within Madison College
- resources available to assist in fulfilling this requirement

Background

What is time and effort reporting?

Time and effort reporting is the federally mandated method of certifying that the salary and benefits charged to a federal grant are accurate and aligned with the effort and activities approved by the funder. It is after-the-fact documentation of how each grant-funded employee spent their time during a given period (effort), related to both grant-funded and non-grant-funded work activities. Recipients of federal grants and cooperative agreements are only allowed to charge reasonable, allowable and allocable costs to their sponsored projects. Grantees must also maintain “records that accurately reflect the work performed.”

Federal Guidance Related to Time and Effort Reporting

The Office of Management and Budget (OMB) issued new guidance in 2013 that takes effect on December 26, 2014, for time and effort reporting. Madison College has revised the time and effort policy to reflect the updated administrative requirements provided by the Supercircular.

Section 200.430 (i) requires that all salaries, wages and benefits charged to a federal award be documented to accurately reflect the work performed. Salaries and wages used to meet the match or cost-sharing requirements must be treated in the same manner as salaries and wages directly charged to an award.

Section 200.430(i)(1) identifies the requirements for documenting personnel expenses. Non-federal entities are required to:

- establish and maintain internal controls that provide "reasonable assurance" that salaries and wages are accurate, allowable, and properly allocated;
- verify that charges to federal awards for salaries and wages are based on records that accurately reflect the work performed;
- incorporate personnel expense documents into the official records of the entity;
• reasonably document the total activity, federally funded and non-federally funded, for which an employee is compensated, not exceeding 100% of compensated activities; (records may reflect categories of activities as percentage of total work performed)
• apply the same accounting policies and procedures for both federally funded and non-federally funded activities.

Who must complete time and effort reports?
The federal government requires time and effort reports for all faculty and staff who are compensated, in whole or in part, by a federal grant, or whose efforts are used to satisfy a required or voluntary match for federal grants.

What is the difference between effort reporting and payroll distribution?
Payroll distributions and effort reports are not the same. For a new grant year, payroll distributions to each grant or cost objective are done initially based on budget estimates. Payroll distributions are the distribution of an individual’s salary and benefits in the accounting records. Effort reports describe the allocation of an individual’s actual time and effort for specific projects, whether or not reimbursed by the grantor. The final payroll distribution includes adjustments to the grant’s annual budget based upon the final effort reports for that budget period.

• Accounting tracks the detailed payroll accounting transactions to accounts created for individual grant agreements and other institutional activities.
• Certifying is attesting that salaries, wages and benefits charged to the grants (including required match portions) and to other institutional activities (including voluntary match) are reasonable in relation to the time and effort actually performed.

What is match or cost-shared effort?
Cost sharing represents the portion of the total project costs of a grant agreement that is not borne by the federal government. The educational institution or other non-federal third party pays these costs. Cost-sharing is frequently referred to as matching.

The grantor may request cost sharing (matching), or the institution may volunteer it. Regardless, any commitment of effort or matching referenced in the project proposal or the award document must be implemented, reported and captured in the effort reporting system.

Time and Effort Process Within Madison College

The Grants Office works in conjunction with the PI and Budget Manager to develop the budget based on the staffing plan needed to accomplish the activities outlined in the project narrative. The Grants Office uses the most accurate salary and fringe information available at the time of grant submission. Once the grant is awarded and staff have been hired, the Grants Office will update the budget with actual salary and fringe information.
Completing Time and Effort Forms

- Once project implementation begins, staff working on grants must complete Time and Effort forms. T & E forms must be signed by the employee and institutions must verify the accuracy of the T & E reports.
- In accordance with Department of Labor regulations implementing the Fair Labor Standards Act (FLSA) (29 CFR Part 5 16), charges for the salaries and wages of nonexempt employees must also be supported by records indicating the total number of hours worked each day.
- Significant changes in the corresponding work activity are identified and entered into the records in a timely manner. Short-term (such as one or two months) fluctuation between workload categories is allowable as long as the distribution of salaries and wages reflects the required level of effort over the full semester/summer reporting period. For example, an employee with 20% of time allocated to a grant may have lesser effort dedicated to a project for a limited period of time (e.g., 10% for a few weeks) provided an increased effort (e.g., 30%) is then dedicated to the project for a corresponding period of time within the reporting period.

Federal regulations do not prescribe a specific form or style of reporting, but the time and effort reporting system must include:
- a system to capture the individual grant category
- a process to review after-the-fact interim charges made to the federal award
- a process to ensure significant changes in the work activity or effort are identified and addressed in a timely manner
- a process to make adjustments in order to ensure the final amount charged is accurate, allowable and properly allocated
- a process by which staff attests that time reported is accurate

Madison College’s time and labor system fulfills the requirements of an acceptable time and effort reporting system when coupled with after-the-fact certification by the employee.

Staff entering time on an hourly basis

- Time cards or time sheets are acceptable methods of tracking time and effort for hourly employees if they select the appropriate grant chartfield and the work they are doing was approved in the grant. Employees should include a statement similar to “I/we certify that to the best of our knowledge the above allocation of time expended performing Federal, State and other program duties is true and accurate”.

Full-time Faculty or Professional Staff dedicating a percentage of their time to a grant

- Full-time faculty and professional staff dedicating a percentage of their work effort on a grant may certify their time on a percentage basis but their effort must be reconciled on at least a semester basis.
Because practices vary as to the activity constituting a full workload, time and effort records may reflect categories of activities expressed as a percentage distribution of total activities.

**Reconciliation**
1. Per federal regulations, if initial payroll costs are recorded in the accounting system based on estimates, they must be reconciled prior to the end of the grant period or fiscal year, whichever comes first. However, federal regulations also state that known deviations in budgeted versus actual costs should be adjusted as close to the time of occurrence as reasonable.
2. Madison College policy requires reconciliation of budgeted to actual effort to occur at the end of each semester or summer session to determine if the actual charges are matching the staffing plan and activities approved by the funder.
3. If the variance between budget and actual is greater than 5%, a budget transfer should be initiated so the grant is charged only what is allocable to grant activities. In this way, accounting records will be adjusted to reflect the actual.

Who is responsible for time and effort reporting within Madison College?

- Principal Investigators and their School or Department
- Time and Effort reporting is managed by the school or department administering the grant. The Grants Office is available to provide guidance in setting up systems to capture the information accurately and in fulfilling the requirements with the least amount of administrative burden.
• The Grants Office has developed time and effort activity templates to assist with the data collection. It should be noted that the requirements for the level of detail required in T & E reporting (e.g., by specific grant activity vs. by overall grant effort) may vary depending on the specific grant program. This information is discussed with the project team as part of the grant start-up process.

The Grants Office will also work in partnership with Grant Accounting to assist during the review and reconciliation of charges made to the federal award and in modifying the project plan or facilitating a budget revision if needed. If you are unsure whether a change in the staffing plan warrants a budget revision or grant modification, please contact the Grants Office at GrantsOffice@madisoncollege.edu.
This record is an after-the-fact determination of actual effort expended for the payroll month and the signer has full knowledge of and can support 100% of these activities, if requested.

Type of Schedule:  
- Daily
- Weekly
- Biweekly
- Other _______________________

<table>
<thead>
<tr>
<th>Class / Assignment/Activity Description</th>
<th>Instruction</th>
<th>Course Prep</th>
<th>Student Advising</th>
<th>Other</th>
</tr>
</thead>
<tbody>
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</tbody>
</table>

PERCENTAGE 0% 0% 0% 0%

TOTAL HOURS

<table>
<thead>
<tr>
<th>Class / Assignment/Activity Description</th>
<th>Instruction</th>
<th>Course Prep</th>
<th>Student Advising</th>
<th>Other</th>
</tr>
</thead>
<tbody>
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</table>

TOTAL HOURS

GRAND TOTAL

I certify that I performed work consistent with the attached schedule and as distributed in the above percentages during the Certification Period.

_________________________  ________________
Employee Signature        Date

I certify that I have firsthand knowledge that the above employee performed work consistent as distributed in the above as distributed in the above percentages during the Certification Period.

_________________________  ________________
Supervisor Signature      Date
APPENDIX G – LINK TO UNIFORM GUIDANCE

Due to its length, the OMB Circular cannot be included in this handbook. However, you may view it in full at the federal register website:
https://www.federalregister.gov/articles/2013/12/26/2013-30465/uniform-administrative-requirements-cost-principles-and-audit-requirements-for-federal-awards
## APPENDIX H – GRANT IDEA FORM

### Grant Idea Form

<table>
<thead>
<tr>
<th>Description of Proposed Project</th>
</tr>
</thead>
<tbody>
<tr>
<td>This form is designed to help a potential grant developer organize and further develop an idea for which funding is sought. It also assists the Grants Office in better understanding the idea and provides a starting point for further discussion about the best strategy for seeking potential funding. Please do your best to reflect on and complete each of the items below. Feel free to contact the Grants Office if you have questions or need help.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Submitted By and Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>Summary of idea/project</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Need: Why should Madison College do this project?</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>Alignment with known local or national trends/initiatives</th>
</tr>
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</table>

<table>
<thead>
<tr>
<th>Alignment with the Madison College Strategic Plan, PILLARS of Promise and Impact Initiative</th>
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</table>

<table>
<thead>
<tr>
<th>Proposed Outcomes: What will be different at the college/in the community if we do this?</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>Proposed College Principal Investigator (PI)</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>Proposed Team Members (internal and external partners)</th>
</tr>
</thead>
</table>
APPENDIX I – GRANT APPROVAL FORM

Madison College Office of Grants and Special Projects

Grant Approval Form

Immediately after identifying a potential funder, please submit this completed form to the Office of Grants and Special Projects.

<table>
<thead>
<tr>
<th>Principal Investigator (PI)</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>School/Department</td>
<td></td>
</tr>
<tr>
<td>PI contact information</td>
<td></td>
</tr>
<tr>
<td>Anticipated project title</td>
<td></td>
</tr>
<tr>
<td>Funding agency/Program title</td>
<td></td>
</tr>
<tr>
<td>Type of funder (federal, foundation, state)</td>
<td></td>
</tr>
<tr>
<td>CFDA# for federal grants (if available)</td>
<td></td>
</tr>
<tr>
<td>Type of proposal (continuation, new, pre-proposal, renewal, revision)</td>
<td></td>
</tr>
<tr>
<td>Type of award/contract (grant, contract, sub-contract, fixed price contract)</td>
<td></td>
</tr>
<tr>
<td>Total allowable funding request</td>
<td></td>
</tr>
<tr>
<td>Brief project description</td>
<td></td>
</tr>
</tbody>
</table>

How does the grant align with the strategic plans of the college?

Duration of project (mm/dd/yyyy-mm/dd/yyyy):

Deadline for submission to funder (date and time):

Are indirect costs allowed (yes/no)?

If yes, identify maximum allowable percentage:

Does the project include cost-sharing or matching funds (yes/no)?

If yes, is it mandatory or voluntary?

Required match percentage or amount:

Anticipated sources of match:
<table>
<thead>
<tr>
<th>Preliminary Budget Scenario</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Funding source</strong></td>
</tr>
<tr>
<td>Anticipated request to funding agency</td>
</tr>
<tr>
<td>Required cash match</td>
</tr>
<tr>
<td>Required in-kind match</td>
</tr>
<tr>
<td>Total project cost</td>
</tr>
<tr>
<td>Estimated yearly cost to sustain project after grant ends <em>(if applicable)</em></td>
</tr>
</tbody>
</table>

**Will the project budget include personnel costs (yes/no)?**

*If yes, please fill in the chart below:*

<table>
<thead>
<tr>
<th>Position/role: (list all project staff by position title)</th>
<th>New position? <em>(Y/N)</em></th>
<th>Incumbent employee? (name)</th>
<th>Percent time and effort on project</th>
<th>If current FT Faculty are working on the grant, provide loading/backfill plan</th>
</tr>
</thead>
<tbody>
<tr>
<td>Course Release?</td>
<td>Assigned</td>
<td>Overload</td>
<td>Hire backfill?</td>
<td></td>
</tr>
<tr>
<td>--------------------------------------------------------</td>
<td>-----------------------</td>
<td>-----------------------------</td>
<td>-----------------------------------</td>
<td>--------------------------------------------------------------------------------</td>
</tr>
</tbody>
</table>

**Will the project involve partnership agreements or contracting/subcontracting with other institutions or agencies (yes/no)?**

*If yes, list institutions/agencies and the nature of their participation:*

<table>
<thead>
<tr>
<th>Institution/agency</th>
<th>Nature of participation/type of contract</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
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</tbody>
</table>

**Will additional space be required for the proposed project (yes/no)?**

**Will available space require alteration, utility modification or environmental safety modification?**

**Will computer equipment be purchased or leased (yes/no)?**

**Does this project involve student financial aid or student support?**

**Will consultants be used?**

**Does the proposed project pose any actual or perceived conflict of interest?**

*If yes, explain:*
<table>
<thead>
<tr>
<th>Does the funder have specific requirements related to sustainability (yes/no)?</th>
</tr>
</thead>
<tbody>
<tr>
<td>If yes, briefly describe these requirements:</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>If no, is it your intention that the college will continue programming and/or staffing beyond the period of the grant (yes/no)?</th>
</tr>
</thead>
<tbody>
<tr>
<td>If yes, how do you propose the college continue the work, and what will it cost each year? What should the college choose not to do if we continue this project?</td>
</tr>
</tbody>
</table>

**Signatures:**

---

Project Director/Principal Investigator

---

Date

---

PI Supervisor/Dean

---

Date

---

*I approve you to begin working with the Office of Grants and Special Projects to develop a proposal for external funding based on the information provided on this form. If significant changes to proposed project arise during proposal development additional approval may be required.*

---

VP/Provost

---

Date

---

Director, Office of Grants and Special Projects

---

Date

---

**Shared with:**

- Finance
- Human Resources
- Facilities
- Budget Office