

HARTNELL COMMUNITY COLLEGE DISTRICT

AP 3280 Grant Concept and Approval (Development)

Reference: Education Code Section 70902

A. Definition

Sponsored programs are administered by the District with funds from sources outside the district (such as the federal, state or local government, or private industry). These funds are for the performance of specific activities at the College. The authority for the District to perform these activities is a contract or a grant award.

The following administrative procedure defines the difference between a public grant and a private grant or gift. It describes the initiation and approval of grant proposals to assist in the timely application, transparency, and alignment with the mission of the District. This includes grants that are in partnership with other institutions.

A public grant is the transfer of taxpayer money or property from a sponsor to an institution. The grant may require performance of specific duties such as research, progress reports, financial reports, and requires return of unused funds. Most funding provided by federal, state, or local agencies in support of Hartnell College is treated as a grant or restricted funding source. In general, government funds are not treated as gifts. For purposes of this procedure, the term “grant” does not include assistance that is or has become an ongoing source of support for state or federally supported, policy-driven initiatives, such as Student Success and Support Funding, EOPS, DSPS, Title IV Federal Student Financial Aid, Perkins, CalWORKs, Scheduled Maintenance, and other programs of this type.

A private grant or gift is the voluntary transfer of non-tax dollars or government property from a private donor to an institution. The donor may be an individual, a corporation, or a nonprofit organization. Donors will receive recognition and a report of how the funds were used. A gift may be restricted or unrestricted. A restricted gift is a contribution designated for specific activities. Only the Foundation may accept gifts on behalf of the College. (See Board Policy 2225.) See Board Policy 6620 and Administrative Policy 6620 for more information on naming facilities and properties as a result of a private gift.

The following chart provides additional detail to best determine if a transaction is a public grant, or private grant or gift. After all factors are considered, if there is a question about a transaction, the superintendent/president will determine what procedures should apply.

Indicators	Private Grant/Gift	Public Grant
Source	<ul style="list-style-type: none"> - Individuals - Family or individual foundations - Nonprofit Organizations - Corporations - Corporate foundations - Other organizations, such as donor-advised funds 	<ul style="list-style-type: none"> - Government Agencies (federal, state, and local) - Partnering Institutions and Organizations
Purpose	The donor may specify an area of interest or a goal to be funded by their gift, as well as reporting requirements	The sponsor specifies how the funds should be used and requires substantial reporting to funding agencies.
Value Exchange	The Foundation, in collaboration with the District, is expected to carry out specific programs as defined by the grant objectives.	The District is expected to carry out specific programs as defined by the funding agency to achieve grant deliverables and objectives.
Reporting	The Foundation has reporting obligations on how the gift was used or invested. Reporting may include details of how, when, and to whom funds were disbursed, as well as statements of earnings, when applicable.	The District is required by the granting agency to report progress and final performance of specific deliverables and objectives, as well as budget and expenditures.
Proposal Process	Originates with the President’s Task Force long-term funding plan, which is assessed annually and approved by Advancement Council and the Foundation Board of Directors.	With the assistance of the grants team, grants are submitted in response to a request for proposal or program solicitation. College Governance Councils propose or review concepts as appropriate.
Documentation	Letter of Donation/Gift Agreement addressed to the Foundation or clearly indicated to be intended for the Foundation.	Award letter and/or Grant Agreement specifying the District or College, not the Foundation.
Deadline/Terms	Compared to public funding, deadlines and terms may vary.	Typically driven by a fiscal year calendar - federal or state.
Excess Funds	May be required to be returned to the sponsor.	May be required to be returned to the sponsor.
Penalty for nonperformance	Penalties may exist for failing to use the funds or to deliver the items on a timely basis.	Penalties may exist for failing to use the funds or to deliver the items on a timely basis.
Determination of indirect cost rates	Overhead rates are determined by the Foundation and built into the grant request.	Overhead rates are determined by the District and applied according to the District’s approved indirect cost rate and as allowed by the federal government or other granting agency.

Funding opportunities that are pursued will align with and support the strategic goals of the District. The District will determine which funding opportunities to pursue based the expertise and available resources to competitively win and successfully implement the activities.

The Office of Institutional Advancement serves the District by facilitating grant development and providing technical assistance for electronic submission of grant applications. The Office of Institutional Advancement, in collaboration with other stakeholders, will present the Board of Trustees with regular updates about grants and grant opportunities.

B. Approval

The superintendent/president reviews and ultimately approves the grant concept form. The grant concept form must indicate support/do not support and include signatures of the proposal lead, area dean, area vice-president, Academic Senate, vice president, advancement and development, accounting manager or controller, and chief business officer. Grant and sponsored program proposals are subject to Board ratification.

C. Report to Board of Trustees

Grant proposals submitted to the Board of Trustees for ratification should be summarized in a manner that clearly identifies:

- The purpose of the grant/program
- Alignment with the mission of the College
- The strategic priorities, goals, and accreditation standards supported by the proposal
- Budget impact to the District
- Partners in the grant proposal
- Requirements for institutionalization, if applicable
- Impact to academic and professional matters

D. Typical Steps in the Process

1. Employees may receive notices of funding availability from various professional organizations.
2. The proposal lead will read the request for application or proposal to determine the requirements and deadlines, obtain the proper application forms, and start the Grant Concept Form.
3. The proposal lead will discuss the project with the area dean or supervisor and the area vice president to obtain their support. These discussions will determine whether the grant aligns with the strategic plan of the District, the impact of the grant on all operational areas, and whether the District and department possess the expertise and resources to successfully implement the grant.
4. The proposal lead will alert the Office of Advancement and the accounting manager to coordinate proposals/projects and otherwise assist in grant development. Consultation will occur regarding areas determined to be impacted by the grant, including the areas of information services, facilities planning and development, administration and

finance and institutional research, human resources and academic affairs.

5. Proposals including academic and professional matters (e.g. curriculum, articulation, and faculty positions) must be presented to Academic Senate for support. See Administrative Procedure 2510 for a comprehensive list of academic and professional matters.
6. The Office of Advancement will obtain the support and signatures necessary to proceed with a formal proposal, including engaging a grant writer (if applicable) and coordinating proposal preparation and submission according to the funder's guidelines. The accounting manager or controller will provide complete support in the development of the grant budget.
7. Prior to grant submission, Business Services shall review the grant application and the accounting manager or controller will ensure that the District submit only allowable costs for grant-related reimbursement. Allowable costs must be:
 - reasonable and necessary (for example, sound business practices are followed, costs are treated consistently with District and awarding agency's policies and procedures, and purchases are comparable to market prices);
 - allocable to the federal award (e.g. cost(s) incurred specifically for the benefit of the award and accomplishment of the sponsored program);
 - in accordance with cost principles for federal awards as outlined in 2CFR 200 Subpart E, OMB Circular A-21, the terms and conditions of the sponsored agreement, and other appropriate federal guidelines;
 - properly documented;
 - consistent with the provisions of the funding agency and the sponsored award;
 - legal under state and local law.

In the event costs are deemed unallowable due to unforeseen circumstances, such as the failure of program participants to meet performance outcomes, the costs will be transferred out of the grant account(s) into the College's unrestricted general fund using an Expenditure Transfer form.

8. After the grant concept form is approved by the superintendent/president, the Office of Advancement will submit the Board Report.
9. The Office of Advancement, The Office of Administrative Services, and the proposal lead will submit the approved proposal to the funding agency. The director of grants development, the accounting manager, or their supervisors, are authorized to serve as certifying officials for the purposes of completing and submitting required grant forms.

See Board Policy 3280

Approved by the Superintendent/President: December 14, 2021