HBCU, HBGI, and SAFRA
TITLE III
Policies and Procedures Manual

Revised February, 2017

NSU Title III Staff
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HBCU, SAFRA, and HBGI Title III Programs: Policies and Procedures Manual

This Title III Policies and Procedures Manual is designed to serve as a reference to activities in the implementation of initiatives approved under said program. This manual does not exclude compliance to university policies and procedures. It is designed to provide specific policies and procedures unique to the Title III programs, to support the proper monitoring and evaluation of program initiatives and to ensure the appropriate expenditure of program funds. This manual serves as a resource document in carrying out the approved plan of operation.

PURPOSE OF THE TITLE III PROGRAM

The Title III Program provides grants to Historically Black Colleges and Universities (HBCU) to establish or strengthen their physical plants, financial management, academic resources and endowment so that they may continue to participate in fulfilling the goal of equality of educational opportunity in the HBCU community.

According to CFR 34 Subpart B, Paragraph 608.10, grant activities may include:

- Student services; educational equipment acquisition; facility renovation and construction; faculty and staff development;
- The establishment of a program of teacher education designed to qualify students to teach in public schools; the establishment of community outreach programs that will encourage elementary and secondary school students to develop the academic skills and the interest to pursue postsecondary education;
- The acquisition of real property in connection with the construction, renovation, or addition to or improvement of campus facilities; education or financial information designed to improve the financial literacy and economic literacy of students;
- Families, especially with regard to student indebtedness and student assistance programs under Title IV; and
- Services necessary for the implementation of projects or activities that are described in the grant application and that are approved, in advance, by the Department, except that not more than two percent of the grant amount may be used for this purpose.

CFR 34 Subpart B, Paragraph 608.10, further states the following grant activities may not be carried out using Title III funds:
(1) Activities that are not included in the grantee's approved application;

(2) Activities described in paragraph (a)(12) of this section that are not approved by the Secretary;

(3) Activities that are inconsistent with any State plan of higher education that is applicable to the institution;

(4) Activities that are inconsistent with a State plan for desegregation of higher education that is applicable to the institution;

(5) Activities or services that relate to sectarian instruction or religious worship; and

(6) Activities provided by a school or department of divinity. For the purpose of this section, a "school or department of divinity" means an institution, or a department of an institution, whose program is specifically for the education of students to prepare them to become ministers of religion or to enter upon some other religious vocation, or to prepare them to teach theological subjects.

Title III funds may be spent only on activities that are included in the approved application. The application must give a description of the activities to be carried out; and it must show how grant funds will be used to supplement, and to the extent possible, increase the funds that would otherwise be made available for the activities to be carried out in the grant. In no case may Title III funds take the place of funds that would otherwise be available. The Office of Management and Budget Super Circular, 2 CFR 200, Subpart E, list other non-allowable expenditures.
STRENGTHENING HISTORICALLY BLACK COLLEGES AND UNIVERSITIES (HBCU) PROGRAM
STRENGTHENING HISTORICALLY BLACK COLLEGES AND UNIVERSITIES (HBCU) PROGRAM

- President
- VP for Finance and Administration
- Title III Director
- Assistant Title III Director
- Data/ Compliance Technician
- Admin Office Specialist
- Executive Secretary

- Enhancing Student Retention and Graduation Rates
- Enhancing Structured Program for Science, Technology, Engineering, Mathematics and Health (STEM-H)
- Developing the Infrastructure for Comprehensive Faculty Development Program
- Project Reach (Restructuring and Enhancing Educational Access for the Contemporary Communities in Higher Education)
- Enhancing Technology Service Delivery to the NSU Campus Community
- Building a Culture of Evidence: Strengthening Processes and Structures to Support Data Informed Decision Making
- Building Enrollment Capacity through Transformation
- Expanding International Studies and Service Learning
- Enhancing the Growth and Sustainability of the University Advancement Program
STRENGTHENING HISTORICALLY BLACK COLLEGES AND UNIVERSITIES (HBCU)


Legislative Allowable Activities. In support of the intent of the program, the legislation, CFR 34 Subpart B, Paragraph 608.10, lists the following allowable activities that can be carried out under this grant:

1. Purchase, rental, or lease of scientific or laboratory equipment for educational purposes, including instructional or research purposes;
2. Construction, maintenance, renovation, and improvement in classroom, library, laboratory, and other instructional facilities, including purchase or rental of telecommunications technology equipment or services;
3. Support of faculty exchanges, faculty development and faculty fellowships to assist these faculty members in attaining advanced degrees in their fields of instruction;
4. Academic instruction in disciplines in which Black Americans are underrepresented;
5. Purchase of library books, periodicals, microfilm, and other educational materials, including telecommunications program materials;
6. Tutoring, counseling, and student service programs designed to improve academic success;
7. Funds and administrative management, and acquisition of equipment for use in strengthening funds management;
8. Joint use of facilities, such as laboratories and libraries;
9. Establishing or improving a development office to strengthen or improve contributions from alumni and the private sector;
10. Establishing or enhancing a program of teacher education designed to qualify students to teach in a public elementary or secondary school in the State that shall include, as part of the program, preparation for teacher certification;
11. Establishing community outreach programs that will encourage elementary and secondary students to develop the academic skills and the interest to pursue postsecondary education; and
(12) Other activities that it proposes in its application that contribute to carrying out the purpose of this part and are approved by the Secretary as part of the review and acceptance of the application.
STRENGTHENING HISTORICALLY BLACK COLLEGES AND UNIVERSITIES STUDENT AID and FISCAL RESPONSIBILITY ACT (SAFRA) PROGRAM
STUDENT AID AND FISCAL RESPONSIBILITY ACT (SAFRA)
PROGRAM ADMINISTRATION

President

VP for Finance and Administration

Title III Director

Assistant Title III Director

Data/Compliance Technician

Admin Office Specialist

Executive Secretary

Enhancing a Diverse Teacher Population: The Future Teacher Academy

Increasing Access to Library Resources and Services to Norfolk State University Students

Strengthening the Student Experience through a Comprehensive Learning Community Initiative
STRENGTHENING HISTORICALLY BLACK COLLEGES AND UNIVERSITIES
STUDENT AID and FISCAL RESPONSIBILITY ACT (SAFRA)

SAFRA funds are awarded under Title III, Part F, Section 371 of the Higher Education Act of 1965 (HEA), as amended. Mandatory funding for the HBCU, Title III, Part F Program was provided under the Student Aid and Fiscal Responsibility Act of 2009 (SAFRA) the Title III P, Part F, Student Aid and Fiscal Responsibility Act of 2009 (SAFRA) program (CFDA No. 84.031B).

**Legislative Allowable Activities.** In support of the intent of the program, the legislation,

The following activities are allowable and can be carried out under this grant:

1. Purchase, rental, or lease of scientific or laboratory equipment for educational purposes, including instructional and research purposes;
2. Construction, maintenance, renovation, and improvement in classroom, library, laboratory, and other instructional facilities, including purchase or rental of telecommunications technology equipment or services;
3. Academic instruction in disciplines in which Black Americans are underrepresented;
4. Purchase of library books, periodicals, microfilm, and other educational materials, including telecommunications program materials;
5. Establishing or enhancing a program of teacher education designed to qualify students to teach in a public elementary or secondary school in the State that shall include, as part of such program, preparation for teacher certification; and
6. Other activities, consistent with the institution’s comprehensive plan and designed to increase the institution’s capacity to prepare students for careers in the physical or natural sciences, mathematics, computer science or information technology or sciences, engineering, language instruction in the less-commonly taught languages or international affairs, or nursing or allied health professions.

**PLEASE NOTE: ENDOWMENT FUNDING IS NOT AN ALLOWABLE ACTIVITY UNDER THE SAFRA MANDATORY FUNDS PROGRAM.**
STRENGTHENING HISTORICALLY BLACK COLLEGES GRADUATE INSTITUTIONS (HBGI) PROGRAM
STRENGTHENING HISTORICALLY BLACK GRADUATE INSTITUTIONS (HBGI) PROGRAM

President

VP for Finance and Administration

Title III Director

Assistant Title III Director

Data/Compliance Technician

Admin Office Specialist

Executive Secretary

Increasing Graduate Student Retention and Degrees Awarded in the College of Science, Engineering and Technology (CSET)
STRENGTHENING HISTORICALLY BLACK GRADUATE INSTITUTIONS (HBGI) PROGRAM

The Strengthening Historically Black Graduate Institutions (HBGIs) Title III Program is funded under the Higher Education Opportunity Act (Public Law 110-315) (HEOA) 2008, and reauthorizes the Higher Act of 1965, as Amended (HEA).

**Legislative Allowable Activities.** CFR 34 Subpart B, Paragraph 609.10, states the following activities are unallowable and cannot be carried out under this grant:

1. Purchase, rental, or lease of scientific or laboratory equipment for educational purposes, including instructional and research purposes.
2. Construction, maintenance, renovation, and improvement in classrooms, libraries, laboratories, and other instructional facilities, including purchase or rental of telecommunications and technology equipment or services.
3. Purchase of library books, periodicals, technical and other scientific journals, microfilm, microfiche, and other educational materials, including telecommunications program materials.
4. Scholarships, fellowships and other financial assistance for needy graduate and professional students to permit the enrollment of the students in and completion of the doctoral degree in medicine, dentistry, pharmacy, veterinary medicine, law, and the doctorate degree in the physical or natural sciences, engineering, mathematics, or other scientific disciplines in which African Americans are underrepresented.
5. Establishing or improving a development office to strengthen or improve contributions from alumni and the private sector.
6. Assisting in the establishment or maintenance of an institutional endowment fund.
7. Funds and administration management, and the acquisition of equipment, including software, for use in strengthening funds, management and management information systems.
8. Acquisition of real property that is adjacent to the campus in connection with the construction, renovation, or addition to or improvement of campus facilities.
9. Education or financial information designed to improve the financial literacy and economic literacy of students or the students’ families, especially with regard to student indebtedness and student assistance programs under title IV of the HEA.
10. Services necessary for the implementation of projects or activities that are described in the grant application and that are approved, in advance, by the Secretary, except that not more than two percent of the grant amount may be used for this purpose.
11. Tutoring, counseling, and student services programs designed to improve academic success.
Relation of Title III Activities to the Mission of the University

All Title III activities must support the mission and goals of the university. The institution’s mission statement identifies certain distinguishing characteristics of the students the university proposes to serve and the programs of study it proposes to offer. The Title III activities must address major problems or deficiencies that inhibit the institution from realizing its mission.

How Title III Funds Are Allocated

HBCU and SAFRA. Funds are allocated by a formula which is based upon the number of Pell Grant recipients at the institution, the number of bachelor’s degree recipients of the institution, and the number of students who graduated from the institution who have been admitted to and are in attendance in graduate or professional schools in a degree program or discipline in which Blacks are underrepresented.

The Grant Allocation Formula

1. Number of Pell Grant recipients at the university during the school year immediately preceding the year of application x 50% of appropriations

   Number of Pell Grant recipients at all applicant institutions during the school year immediately preceding the year of application

2. Number of graduates at the university during the school year immediately preceding the year of application x 25% of appropriations

   Number of graduates of the university during the school year immediately preceding the year of application

3. Percentage of graduates, who within five years of graduating with baccalaureate degrees, are in attendance at graduate or professional schools and enrolled in degree programs in disciplines in which Blacks are underrepresented x 25% of appropriations

   The sum of the percentages of those graduates of all applicant institutions

4. Add the amounts obtained in 1, 2, and 3.
HBGI. Funds in excess of a $62,900,000 allocation shall be made available to eligible institutions pursuant to a formula developed by the Secretary that uses the following elements:

(A) The ability of the institution to match Federal funds with non-Federal funds.
(B) The number of students enrolled in the programs for which the eligible institution received funding under this section in the previous year.
(C) The average cost of education per student, for all full-time graduate or professional students (or the equivalent) enrolled in the eligible professional or graduate school, or for doctoral students enrolled in the qualified graduate programs.
(D) The number of students in the previous year who received their first professional or doctoral degree from the programs for which the eligible institution received funding under this section in the previous year.
(E) The contribution, on a percent basis, of the programs for which the institution is eligible to receive funds under this section to the total number of African Americans receiving graduate or professional degrees in the professions or disciplines related to the programs for the previous year.

Eligibility for Continuation Funds

Once the University receives a five-year Title III grant, the Department of Education will consider continued funding of the application if (1) funds are available, (2) the Department determines that continuing the project would be in the best interest of the government, and (3) the recipient shows satisfactory progress toward the goals of the project and submits a continuation application.
TITLE III PERSONNEL

Title III personnel consist of the Title III Director and staff, the Office of Finance and Administration which oversees the Title III Office, and the Grants and Contracts Accounting Office who has the responsibility for the accounting functions of the grant.

Title III Activity Directors

The following persons have been designated to serve as activity directors for the Strengthening Programs:

HBCU

Enhancing Student Retention and Graduation Rates .............................. Dr. Robin Marable

Enhancing Structured Program for Science, Technology, Engineering,
Mathematics and Health (STEM-H) Disciplines ........................... Dr. Michael Keeve

Developing the Infrastructure for Comprehensive Faculty Development
Program .......................................................... Dr. Dorothy Jones

Project Reach (Restructuring and Enhancing Educational Access
for the Contemporary Communities in Higher Education) .......... Dr. Dorothy Jones

Enhancing Technology Service Delivery to the NSU Campus
Community .......................................................... Dr. Wayne Davis

Building a Culture of Evidence: Strengthening Processes and Structures to Support Data
Informed Decision Making ........................................ Dr. Linda McCluney

Building Enrollment Capacity through Transformation ............... Dr. Michael Shackleford

Expanding International Studies and Service Learning Across
the Curriculum .......................................................... Dr. Eddie Modlin

Enhancing the Growth and Sustainability of the University
Advancement Program .................................................. Dr. Deborah Fontain
SAFRA

Enhancing a Diverse Teacher Population: The Future Teacher Academy ................................................................. Dr. Denise Littleton

Increasing Access to Library Resources and Services to Norfolk State University .................................................... Dean, Marc Finney

Strengthening the Student Experience through a Comprehensive Learning Community Initiative ................................................. Mr. Edward Willis

HBGI

Increasing Graduate Student Retention and Degrees Awarded in the College of Science, Engineering and Technology (CSET) ................................................................. Dr. Larry Mattix
NSU TITLE III OFFICE

ROLES/EXPECTATIONS

The Title III Office serves as the administrative unit for the HBCU program. Our primary goal is to ensure that the institution remains in compliance with federal regulations and inform the Provost and the NSU Title III community of the latest trends affecting the use of Title III funds received by way of the United States Department of Education.

ORGANIZATIONAL OBJECTIVE

To ensure Title III funds are utilized to strengthen the academic and administrative services of Norfolk State University and provide effective management of the Title III funds in accordance to United States Department of Education regulations.

Management and Compliance

All Title III Activities will be evaluated by assessing the impact of spending to support program initiatives and by comparing the stated objectives with the achieved outcomes. The following visits will be conducted:

1. Semi-Annual Budget Site Review
2. Semi-Annual Site Visit
3. Inventory Review
4. External Evaluation

Training

The main responsibility of the Title III Office staff is to meet the needs of activity directors and support staff by providing guidance on the processes and procedures pertaining to Title III. Specifically, Title III office staff is responsible for providing support and training for effective management of the Title III funds. This includes:

1. Streamlining processes for effective management and processing of pertinent Title III forms.
2. Attending required meetings to stay abreast of the latest trends affecting Title III.
3. Establishing effective ways to communicate Title III processes, requirements and DOE updates to Administrators, Activity Directors, and support staff.

**NOTE:** The Title III Office is not responsible for training activity directors and staff on university policies and procedures.

**RESPONSIBILITIES OF NSU TITLE III ACTIVITY DIRECTORS**

**Title III Activity Directors**

Activity Directors are responsible for the overall management and day-to-day operations of the activity. Additionally, activity directors are responsible to the Title III Office for matters related to the procedural and regulatory compliance of the activity. This would include reporting requirements; allowability of expenditures, record keeping, and any modifications to the activity budget and objectives. **Only activity directors and designated support staff should initiate requests for funds, and the requests must be based upon the approved Title III budget.**

Specifically, activity directors’ responsibilities include:

1. Managing the approved plan of operation for the assigned unit/department
2. Planning and implementing project activities to occur during the approved budget period
3. Selecting key personnel to carryout activity objectives
4. Staying abreast of Title III and University policies and procedures
5. Managing activity budget and submitting appropriate requests for budget modifications (i.e. justifications/budget revisions)
6. Overseeing the tracking of expenditures and updating Title III activity budget workbook
7. Ensuring goods and services procured are received in Colleague
8. Completing and submitting Title III internal reports (T&E & Quarterly reports) by the required deadlines
9. Ensuring inventory purchased with Title III is properly labeled and documented in activity files
10. Developing a systematic plan for data collection in support of project outcomes to serve as evidence for activity progress
11. Compiling activity data for the Title III Impact Study Report
12. Assisting with the completion of the U.S. Department of Education Annual Reports: Interim (when required), Annual Performance and Final Performance reports
13. Attending scheduled Title III meetings
14. Completing the annual activity report for the Summative External Evaluation
15. Attending the External Evaluation opening session, on-site interview (along with key personnel associated with the grant) and exit session
16. Developing the T3 continuation proposal for the assigned activity and actively seeking external funding.

**FISCAL MANAGEMENT**

**PERSONNEL**

For all Title III positions, there must be a search procedure to ensure that the hiring of persons supported by Federal funds is in compliance with all applicable Federal regulations and is within the framework of the Title III Plan of Operation and budget. Documentation for personnel management is essential and should be kept according to the guidelines that follow.

**Hiring of Personnel**

Personnel are to be hired in a nondiscriminatory manner according to the provisions of the Administrative and Professional Faculty Handbook and the Equal Employment and Education Opportunities policy employed by Norfolk State University. The Title III Office requires the activity director to provide an HR1 Form – Departmental Request for Personnel Action for each person who is hired to work in the grant. Also, keep on file a copy of all resumes of persons selected for Title III jobs.

All regular University hiring procedures will be followed in the hiring of personnel for the Title III grant. The following procedures should be used to fill Title III positions:
1. Activity completes the appropriate personnel recruitment forms, as required by Human Resources, and forwards the completed form to the proper offices for approval. (Note: Federal regulations require that the Title III Office signs all documents.)

2. Human Resources advertises position via requested media.

3. Human Resources reviews all applications and refers to the supervisor only those that meet the qualifications for the position advertised.

4. Activity director interviews the prospective employees. (Note: No applicant should be interviewed before the first three steps have been taken.)

5. After a potential employee has been selected, HR completes a Personnel Action form and forwards it to the proper offices for approval. (Note: The new employee must not begin work prior to the processing of this form and the receipt of a letter of employment from HR.)

Note: Employees paid from the Title III grant are employed for the period stipulated in the grant contract.

The Title III Office must be supplied the credentials of all persons hired with Title III funds. A copy of the employee’s employment vita or resume will serve this purpose. When employees leave or are replaced for any reason, the Title III Office must be informed immediately. Copies of correspondence, resignation letters and appropriate HR forms will serve this purpose.

Reports of Time and Effort of Employees

The U.S. Department of Education requires documentation of time spent working on Title III activities by all persons wholly or partially paid with Title III funds. Employees should, therefore, complete the monthly Time & Effort Report and submit it to the Title III Director by the thirtieth (30th) day of the month following that which service was rendered. The Time & Effort Report must be signed by the Department Head/Dean, Activity Director, Employee, and the Title III Director.
FACULTY COMPENSATION FOR WORK PERFORMED

Federal regulations described in 2CFR 220, Appendix A, Principles for Determining Costs Applicable to Grants, Contracts and Other Agreements with Educational Institutions, limit the amounts that may be paid for work performed in the grant. The regulations also prohibit payments for intra-university consulting.

Salary Rates for Academic Year

Charges for work performed in this grant by a faculty member during the academic year must be based on the faculty member’s regular compensation for the continuous period, which under the practice of the institution concerned, constitutes the basis of the salary. Charges for work performed during all or any portion of such period is allowable at the base salary rate. In no event will the charge, irrespective of the basis of computation, exceed the proportionate share of the base salary for that period. Any extra compensation above the base salary for work in the grant during the academic year is unallowable. This principle applies to all members of the faculty at the institution.

Intra-university Consulting

Since intra-university consulting is assumed to be undertaken as a university obligation requiring no compensation in addition to full-time base salary, the principle described above also applies to those who function as consultants or otherwise contribute to a research agreement conducted by another faculty member of the same institution. However, in unusual cases where consultation is across departmental lines or involves a separate or remote operation, and the work performed by the consultant is in addition to his regular departmental load, any charges for such work representing extra compensation above the base salary are allowable provided such consulting arrangement is specifically provided for in the
approved application or approved in writing by the U.S. Department of Education (2CFR 220, J.10, p. 90).

**Salary Rates for Periods outside the Academic Year**

Charges for work performed by faculty members on sponsored agreements during the summer months or other period not included in the base salary period will be determined for each faculty member at a rate not in excess of the base salary divided by the period to which the base salary relates, and will be limited to charges made in accordance with other parts of this section (2CFR 220, J.10, p. 90). For example, a base salary of $45,000/9 mos. equals a monthly compensation of $5,000 x the actual number of summer months worked.

**REPORTS OF RELEASE TIME OF UNIVERSITY EMPLOYEES**

The University is required to document the release-time efforts of employees. To avoid supplanting University funds, the University must continue to pay for the work from which an employee is released; and the University must document the funds paid. Faculty and staff who are released from their regular duties to work on the Title III project are subject to the salary limitations described in “Faculty Compensation for Work Performed.”

**TRAVEL**

Travel with Title III funds is allowable only for travel expenses identified in the approved grant application. Changes in approved travel must be justified. Travel that is not identified in the approved application requires approval by the Title III Office.

**Approval for Travel**

Title III personnel who travel with grant funds must submit a travel request to the Title III Office no less than thirty days prior to the actual travel date. Travel expenses must be limited to only those expenses that are necessary for providing essential services to Norfolk
State University (State Travel Regulations, 2010, Topic No. 20335). **Note:** All travel must be approved in advance in the Colleague Financials system.

*Travel by Public Carrier*

Employees who travel by airline or other public carriers have two options for securing tickets: 1) Book through Covington International Travel (agency on contract with University) or 2) Charge tickets to a personal credit card. Tickets secured by the second option will only be reimbursed after the trip has been completed. **Note:** The boarding pass stub along with a hardcopy of the internet page showing total cost and confirmed service must be attached to the reimbursement voucher. Also, tickets acquired through Covington Travel are not reserved until Procurement Services contacts the agency and make payment with the University credit card.

*Meals, Lodging, Registration Fees, and Other Expenses*

**Meals and Incidentals.** Meals and incidental travel expenses (personal phone calls, laundry, tips, etc.) are reimbursable only for overnight official business travel outside the traveler's official station. Reimbursement for said expenses will be reimbursed on a per diem system. Per diem rates for U.S. cities are listed in the *NSU Employee Pocket Travel Guide*. **Note:** Per diem rates are adjusted to accommodate for travel days and meals that are included in the conference registration cost.

**Lodging.** The Commonwealth reimburses actual expenses up to a daily maximum rate plus taxes and surcharges. These basic in and out-of-state and city specific rates are listed in the *NSU Employee Pocket Travel Guide*. If approved, rates can be no higher than 150% of the standard rate for your particular location. The *December 15, 2011, NSU Employee Pocket Travel Guide* states that, “rates higher than 150% require approval from the appropriate Vice President, Accounts Payable and the Manager of General Accounting at the Department of Accounts
(DOA) in Richmond prior to travel.” Allow at least 45 days prior to travel to seek approval for lodging exceptions. If a request for exception has not been approved prior to travel, it will not be approved (NSU Employee Travel Guide, December 2011).

**Registration Fees.** Travelers can cover registration costs by one of the following options: 1) Pay in advance and seek reimbursement upon return with a paid receipt; or 2) Request a university issued purchase order or check. Attach a copy of the original registration form to the travel request.

**Other Business Expenses.** Anticipated charges for business-related phone calls, postage, internet charges, etc. must be itemized on the travel request under “other”. **Note:** A full, written explanation of these charges must be provided (NSU Employee Travel Guide, December 2011).

**Mileage.** Employees are permitted to use their personally owned automobile when a State-owned vehicle or Office of Fleet Management Services (OFMS) rental vehicle is not available, or when the use of a personally owned vehicle is cost-beneficial to the agency. Employees electing to use their personal vehicle as a matter of convenience will be reimbursed for mileage at the lowest combined capital and operational trip pool rate charged by OFMS. The Personal Vehicle Use Statement at the top of the Travel Expense Reimbursement Voucher should be checked with the appropriate choice. The rate of reimbursement is provided in the *NSU Employee Travel Guide*.

**Car Rental.** NSU Travel guidelines stipulate that rental car reimbursement cost will only be granted for official business. Title III will only approve rental car expenses when the traveler can demonstrate in writing that this mode of travel is more economical than utilizing public transportation to commute between the airport, hotel and conference site. Car rental must be
secured through Enterprise Leasing Company and the original receipt must be attached to the reimbursement voucher.

**Travel Advances**

In accordance to the *NSU Employee Travel Guide*, the Title III Office will only approve travel advances for faculty/staff accompanying students to conferences. **Note:** Advances must be repaid 30 days after the check issuance date.

**Out-of-the-Country Travel**

Per the NSU Travel Guide, approval for out-of-the-country travel must be obtained from the Office of the Provost or the President’s office prior to traveling overseas. **Title III restricts out-of-the-country travel to trips that have been included and approved in the original proposal submission.** All exceptions must be justified and approved by the U.S. Department of Education Program Officer. **Note:** Out-of-the-country authorization is required for any travel outside of the 48 attached states. (Alaska, Hawaii, and U.S. territories are considered out of the country.)

**Reimbursements for Approved Travel**

After the travel has taken place (within 30 days), prepare a Travel Reimbursement Voucher. To the voucher, attach receipts for taxi fares, hotel accommodations, fees, and other reimbursable expenses. No receipts are required for meals. Secure the signature of the Department Head, or the Dean, and submit the package to Accounts Payable. **Note:** A copy of the conference itinerary and registration form must accompany the voucher as well.

**Report on Travel with Title III Funds**

Persons whose travel expenses are paid by the Title III grant are required to complete a “Report on Travel with Title III Funds.” A copy of the report is available on the Title III
website, www.nsu.edu/titleiii. This document should be maintained with the activity’s office files.

**EQUIPMENT**

Equipment is nonexpendable tangible personal property which has an acquisition cost of $5,000 or more per unit and a useful life of more than one year (EDGAR 74.132). **Note:** NSU Title III policy stipulates that items of this nature are acquired during the first quarter of the grant year.

**Acquisition of Equipment and other Facilities**

The cost of permanent equipment or other facilities is allowable where such purchases are approved by the Sponsoring Agency concerned or provided for by the terms of the research agreement. Total expenditures for permanent equipment may not exceed 125 percent of the amount allotted for the permanent equipment category by the sponsoring agency (through an approved budget or other document) except with approval.

**General Purpose Equipment.** Approval must be obtained to acquire with Government funds any general purpose permanent equipment, i.e., any items which are usable for activities of the institution other than research, such as office equipment and furnishings, air conditioning, reproduction or printing equipment, motor vehicles, etc. or any automatic data processing equipment (2CFR 220).

**Limitations on Purchase of Equipment**

*Only items listed in the final approved Plan of Operation can be purchased without further approval by the Department of Education.* To order equipment included in the approved final plan, complete a requisition for purchase according to the instructions listed under procurement.
**USDOE Equipment Management Requirements (EDGAR 74.140)**

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

(a) Property records shall be maintained accurately. (Retention and access requirements for these records are explained in Subpart D of the *Education Department General Administrative Regulations.* For each item of equipment, the records shall include:

1. A description of the equipment, including the manufacturer’s model number, if any.
2. An identification number.
3. Identification of the grant under which the recipient acquired the equipment.
4. The information needed to calculate the Federal share of the equipment. (See 74.142).
5. Acquisition date and unit acquisition cost.
6. Location, use, and condition of the equipment and the date the information was reported.
7. All pertinent information on the ultimate transfer, replacement, or disposition of the equipment.

(b) A physical inventory of equipment shall be taken and the results reconciled with the property records at least once every two years to verify the existence, current utilization, and continued need for the equipment. A statistical sampling basis is acceptable. Any differences between quantities determined by the physical inspection and those shown in the accounting records shall be investigated to determine the causes of the differences.

(c) A control system shall be in effect to insure adequate safeguards to prevent loss, damage, or theft of the equipment. Any loss, damage, or theft of equipment shall be investigated and fully documented.
(d) Adequate maintenance procedures shall be implemented to keep the equipment in good condition.

(e) Where equipment is to be sold, the Federal Government is to have a right to part or all of the proceeds; selling procedures shall be established which will provide for competition to the extent practicable and will result in the highest possible return.

**Title III/University Inventory Guidelines**

Department heads and administrative unit heads will be responsible for acquisition and care of assigned equipment. Any acquisition, disposal, or transfer of equipment should be promptly reported to the Fixed Assets Accountant by the responsible person on an Inventory Change Form. (This form and instructions are available on the “O” Drive in the folder entitled Financial Services).

The University will maintain an inventory of all land, buildings and equipment costing $5000 or more, all equipment purchased with federal funds costing $5000 or more, and all Equipment Trust Fund items. Microcomputers, laser printers, LCD projectors, digital cameras, laptop computers, firearms, and palm pilots, regardless of cost, will be included in the inventory. Items owned by faculty, students, and staff will not be included. (Policy No. 14, NSU Finance and Business Policies and Procedures Manual)

**New Equipment.** When an activity acquires new equipment under a Title III grant, it is required to:

- Complete the Title III Equipment Log in its entirety. **Note:** For any section that cannot be completed at the time of submission, indicate TBD (To Be Determined) and submit an updated document to the Title III Office once the information is available.
- Submit document to the Title III Office quarterly.
**Surplus Equipment.** When disposing of equipment that becomes obsolete or is no longer in usable condition, the activity is to follow the procedure below:

- Complete the Inventory Change Form found on the “O” drive in the Financial Services folder, under Accounting Forms.
- Send completed document to Central Warehouse and warehouse personnel will schedule a pickup for the items.
- Send a copy of the completed document to the Title III Office for its official files. (Include on this copy the budget number for the year in which the item was purchased. For items purchased utilizing unobligated funds, include the year of purchase and both the activity account number and the unobligated account number.)

**Lost, Damaged, or Stolen Equipment.** Equipment that is lost or stolen should be reported on the Inventory Change Form and the activity is requested to submit a copy of the police report to the Title III Office no later than three days after report has been filed with campus police. This report should include all pertinent information, such as: budget account number, NSU ID number, serial number, and date of theft.

**Loans and Transfers.** Equipment is approved for use of requisitioning activity only and should be moved only if the activity is being moved to a different location. The Title III Office maintains responsibility for information on the location and use of all equipment purchased with Title III funds. Each activity is requested to:

- Report **equipment** loaned or transferred from one department to another on an Inventory Change Form and provide the Title III Office with a copy. Items on loan from other agencies or organizations are not included in the inventory.
- Complete and submit a signed copy of the Loan of Property Agreement to the Title III when removing Title III property from the campus. (Include on the form the budget account number, the NSU ID number, the serial number, the name of the department to which the equipment is assigned, the name and social security number of the person in possession of the equipment, and duration of the loan.)

*NOTE: Please remember to retain a copy of all forms submitted to the Title III Office for your official records.*
Identification of Equipment Purchased with Title III Funds

All equipment purchased with Title III funds must be identified with a Purchased Through Title III Funds identification strip that can be acquired from the Title III Office. Additionally, all equipment acquired with Title III funds must be available for inspection by the Title III Office, external evaluators, and persons making site visits for the United States Department of Education.

SUPPLIES

“Supplies” means all tangible personal property other than equipment.

Acquisition of Supplies

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

RENOVATION AND CONSTRUCTION WITH TITLE III FUNDS

Activity Directors are responsible for ensuring that a facilities management representative is aware that the approved renovation project is supported with Title III funds. Specifically, written correspondence is required to be submitted to Facilities Management indicating the nature of the approved project and the amount of federal dollars allocated for the project within the given fiscal year. This information must be provided to Facilities Management before
estimates are acquired and requisitions for any renovation or other associated costs are entered in Colleague.

**OTHER**

All budget items not classified as personnel, supplies, travel, contract, or equipment are included in the budget classification “Other.”

**Consultants**

All consultations must be in accord with the objectives of the grant. Additionally, university policy requires that a *Return on Investment* form accompany all requests for consultants. (This form can be found on the Title III website).

**Guidelines for Utilizing Consultants**

A. Before the assignment starts

1. Identify the problem to be solved
2. Accent suggestions from those who will be affected by the solution to the problem

B. Selecting a consultant and evaluating his/her credentials

1. Acquire performance data and resumes describing the consultant's specialty
2. Confer with references (Preferably persons who have used a consultant's services) to determine whether the consultant:
   (a) prepares a range of activities that respond to the distinct needs of the training audience
   (b) helps participants resolve their own problems by a careful examination of their present behavior
3. Avoid the "buddy system" prevalent in in-service education programs

C. Initial communication with the consultant

1. Leave no doubt as to the specific mission to be undertaken during the consultation
2. Provide a clear description of the services to be rendered
3. Ask for examples of the consultant's previous professional work, published manuscripts, position papers, program development activities, etc.
4. Give an estimate of the length of time necessary to complete the task
5. Say how much you can pay and give the method of payment
D. Preparing for the consultant

1. Determine whether the consultant will be responsible for travel and other expenses or if the University will secure and pay for travel and lodging arrangements
2. Put in writing and submit to the consultant:
   (a) a clear, precise, and carefully articulated description of the service to be rendered
   (b) a fixed maximum fee to include both time and reimbursable expenses
   (c) an estimated completion time for the consultant
   (d) the number and type of reports that will be required (at least one written report, giving recommendations)
3. Select a capable staff member to act as liaison between consultants and university personnel
4. Take care of arrangements for meeting, including place, seating arrangements, incidentals; provide office space if necessary

E. During the assignment

1. Hold the consultant accountable for completing the task
2. Use the following check list to determine how the consultant is performing
   (a) Did the engagement start on schedule?
   (b) Have substitutions been made in the consulting team specified in the agreement?
   (c) Is the consultant actually doing any work?
   (d) Are interviews conducted professionally?
   (e) Are data being generated that will be useful?

F. After completion of the consultation

1. Pay the consultant what has been specified in the agreement
2. Ask when you may expect the consultant’s written report and recommendations
3. Evaluate the consultant’s recommendations to determine which can be accepted
4. Implement as soon as possible any recommendations you decide to accept

G. Implementing the recommendations

1. Ask for the consultant’s help if you need it
2. Follow up the implementation and make sure what is being done conforms to what should be done

H. Submit a copy of the written report of the consultation to the Title III Office
Use of University Personnel as Consultants

Information on use of University personnel as consultants is provided under the heading, “Faculty Compensation for Work Performed” found on pages 10 and 11 of this manual.

Payment of Consultant Fees

Expenses for consultants are charged to the “Employee Development” budget line for the University and can be paid by utilizing one of the following options:

1. Activity acquires and pays lodging and fares, then requests a check to cover consultant’s fee.
2. Consultant acquires and pays all travel expenses and an adjustment is made to his fee to include said expenses.

Standards for Documentation for Use of Consultants

The following information represents the minimum standards for documentation in support of the use of consultants:

1. Evidence that the services of the consultants are needed and the need cannot be met by direct salaries provided under the grant or by employees of the University.
2. Evidence that a selection process has been employed to secure the most qualified individual available, considering the nature and extent of the services to be required.

WORKSHOP EVALUATION

Title III participants should evaluate the effectiveness of workshops sponsored by the grant. Each workshop participant should be asked to complete an evaluation form. A summary of the evaluation should be retained in the activity’s files.

PROGRAMMATIC CHANGES AND BUDGET REVISIONS

The budget plan is the financial expression of the project or program as approved during the award process. It may include either the Federal and non-Federal share, or only the Federal
share, depending upon ED requirements. It shall be related to performance for program evaluation purposes whenever appropriate.

**Revisions**

Recipients are required to report deviations from budget and program plans, and request DOE prior approvals for budget and program plan revisions in accordance with the following:

- Change in the scope or the objective of the project or program.
- Change in a key person specified in the application or award document.
- The absence of more than three months, or a 25 percent reduction in time devoted to the project, by the approved project director or principal investigator.
- Need for additional Federal funding.
- The inclusion, unless waived by the Secretary, of costs that require prior approval in accordance with 2CFR 220.
- Transfer of funds allotted for personnel, fringes, equipment, and training stipends.
- Unless described in the application and funded in the approved awards, the subaward, transfer or contracting out of any work under an award.

**Note:** Revisions to the budget are limited to one per grant year.

**Justifications**

Recipients are required to acquire approval from the Title III Director for the following deviations:

- Transfer of funds allotted for travel, supplies, contractual, construction and other
- Creation of a new line under the above categories
- Acquisitions of items that a part of the above categories, but were not included in the approved budget.

**Note:** Justifications are limited to one each during the first three quarters of the grant year.

**Requests to USDOE/Title III Director to Redirect the Use of Funds**

Requests made to redirect the use of funds should include the components addressed on the *Budget Revision/Justification Checklist*. 
University Budget Line Adjustment

Budget revisions/justifications that require transfer of funds among university budget categories should be prepared on a Budget Line Adjustment form. All Budget Line Adjustments should accompany budget justifications or revision requests.

ENTERTAINMENT EXPENSES

According to 2CFR 220, federal funds cannot be used for reimbursement of expenses for entertaining. Any costs incurred for amusement, social activities, and any items relating thereto, such as meals, lodging, rentals, transportation, and gratuities, are not allowable.

PROCUREMENT POLICIES

In order to obtain the properties and services needed to carry out the objectives of your activity, follow the University’s policies and procedures. Any deviation might result in delays in acquiring what is needed.

MONITORING BY THE TITLE III OFFICE

The Title III Office will keep a record of activity expenditures, and will review each requisition to determine your account balance before the requisition is processed. Activities should maintain their own record of expenditures in the Title III workbook, using the Colleague Financials confirmation email as documentation.

RECORD-KEEPING AND RETENTION

The U.S. Department of Education requires the University to keep records that show the amount of funds under the grant, how the grant funds were used, the total cost of the project, share of cost provided from other sources, and other records to facilitate an effective audit. The University must keep records that show compliance with program requirements and records that show significant project experiences and results. These records must be retained for three years
after the final financial report is submitted for the activity for which the funds were granted. Should any litigation, claim, or audit start before the expiration of the 3-year period, the records shall be retained until all litigation, claims, or audit findings involving the records have been resolved and final action taken.

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

**Records to Retain for Audit Purposes and External Evaluation (Financial and Program)**

1. Budget reporting forms
2. Budget Revisions Worksheets (including Departmental Transfers)
3. Quarterly reports of progress
4. Telephone conversation records
5. Emails
6. Equipment inventory forms
7. Contracts
8. Registration forms and other documents from faculty development and training activities
9. Time & Effort Reports
10. Personnel Action Forms and other employment information (including vita, application forms, and affirmative action forms)
11. Consultant’s reports
12. Purchasing requisitions
13. Travel reports
14. Released time reports
15. Evaluation reports
16. Workshop evaluations
17. Documents showing progress toward achieving objectives
ANNUAL PERFORMANCE REPORT

To receive a continuation award, recipients of the Title III grants must submit an annual performance report that demonstrates that substantial progress has been made toward meeting the objectives of the project. Activity Directors will be notified of the report requirements and submission dates.

Specifically, the annual report will consist of the following sections:

1. Executive Summary
2. Institutional Profile
3. Activities, Focus and Outcomes
4. Project Status and Budget
5. Technology

REPORTING PROGRESS IN ACHIEVING TITLE III OBJECTIVES

Internal evaluations are required by the U.S. Department of Education. Norfolk State University also conducts external evaluations for its Title III grant. The Education Department General Administrative Regulations state that “recipients shall monitor the performance of grant and subgrant supported activities. They shall review each program, function, or activity to assure that adequate progress is being made towards achieving the goals of the grant or subgrant.” Internal evaluation will be carried out through quarterly monitoring reports, annual performance reports, Title III meetings, quarterly budget reviews and site visits. External evaluation must be completed at least annually. External evaluators will determine progress in achieving the objectives in the approved application; the effectiveness of the project in meeting the purposes of the program, and the effect of projects on the persons being served by the projects.
Internal Evaluation

Quarterly Reports of Progress. In order to provide systematic documentation of the achievement of objectives for each of the grant activities, each activity director will complete a report of progress in achieving grant objectives each quarter. The reports are to be placed on the forms provided by the Title III Office. They will be due according to the schedules included in the Title III Start-up Packet.

Annual Performance Report. In response to the Government and Performance Report Act (GPRA) of 1993, the annual performance report was modified to a web-based collection instrument. Its intent is to more accurately relay to Congress the effectiveness of the Title III Program in relation to the governing legislation that establishes its purpose.

Semi-Annual Budget Site Reviews. In an effort to actively keep activity directors abreast of their spending level throughout the grant year, the Title III Office will conduct quarterly visits to review activity budgets. The reviews will be conducted on site and will focus on:

1. Budget tracking system
2. Expenditure recording
3. Spending level
4. Status of unexpended funds

Semi-Annual Site Visits. In an effort to keep activity directors on target with proposed objectives and timelines, the Title III Office will conduct quarterly visits to discuss activity progress. These visits will be conducted on site as well and will focus on evidences of completion, appropriateness of proposed timelines, and adequateness of documentation.
External Evaluation

The HBCU Program and the individual grant activities are evaluated annually by an independent external evaluator. The evaluator conducts a summative evaluation (end of grant year) at the culmination of the grant year. Evaluators look at all aspects of grant activities, including a comparison of actual accomplishments to the goals established for the period, documentation, and project expenditures, as well as effect of the project on strengthening the University.

OBLIGATION OF FUNDS DURING THE GRANT PERIOD

The University may use grant funds only for obligations it makes during the grant period. All requisitions should be entered in ample time for the obligation to be made within the grant period. The table below shows when obligations are made for various kinds of property and services (EDGAR, 75.707).

When Obligations for Goods and Services are Made

<table>
<thead>
<tr>
<th>If the obligation is for</th>
<th>the obligation is made</th>
</tr>
</thead>
<tbody>
<tr>
<td>(a) Acquisition of real or personal property</td>
<td>On the date the University makes a binding written commitment to acquire the property</td>
</tr>
<tr>
<td>(b) Personal services by an employee of the University</td>
<td>When the services are performed</td>
</tr>
<tr>
<td>(c) Personal services by a contractor who is not an employee of the University</td>
<td>On the date which the University makes a binding written commitment to obtain the services</td>
</tr>
<tr>
<td>(d) Performance of work other than personal services</td>
<td>On the date which the University makes a binding written commitment to obtain the services</td>
</tr>
<tr>
<td>(e) Publicity service</td>
<td>When the University receives service</td>
</tr>
<tr>
<td>(f) Travel</td>
<td>When the travel is taken</td>
</tr>
<tr>
<td>(g) Rental of real or personal property</td>
<td>When property is used by the University</td>
</tr>
</tbody>
</table>