

“Grant” as used in the procedure shall refer to a government grant as defined in this procedure. Private grants and gifts that are processed through the MiraCosta College Foundation are addressed in Administrative Procedure 3820, Gifts.

The following administrative procedure defines the difference between a governmental grant and a private gift. It governs the initiation, approval, and administration of the governmental grant development process to assist in the timely application for and processing of new grant applications and to assure that such grants directly support the mission of the district. This includes grants that are in partnership with other institutions. The process for grants requiring new applications each subsequent year or augmentations of existing grants or categorical programs are addressed at the end of this procedure.

A government grant is the transfer of taxpayer money or property from a sponsor to an institution that may require performance of specific duties such as research, budget reports, progress reports, and return of unused funds. Most funding provided by federal, state, or local agencies in support of MiraCosta College is treated as a grant. 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 matriculation, EOPS, SAS, Title IV Federal Student Financial Aid, VTEA, CalWorks, scheduled maintenance, and other programs of this type.

A private grant or gift is the voluntary transfer of nontax 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 are/were used. A gift may meet the interests of the donor and can be restricted or unrestricted. A restricted gift is a contribution designated for a specific purpose, program, or project. Such gifts may require reporting back to let donors know the funds were used as intended. Only the Development Office and the Foundation may accept gifts on behalf of the college. In the unusual situation when a donor specifies that a grant is made directly to the college, the Board of Trustees accepts or rejects the gift. If the donation’s characteristics fall within both categories, the factors in the chart below should be taken into consideration for determining whether it is a gift or a grant.

The presence of any single factor does not represent the condition of gift or grant. To best determine if a transaction is a gift or a grant, all of these factors should be considered simultaneously. In cases where there is a question as to whether an activity for which external funding is sought constitutes a grant or a gift, the superintendent/president will determine what procedures should apply.

GIFT vs. GRANT: TABLE OF INDICATORS FACTOR	PRIVATE GRANT	GOVERNMENT GRANT
Source	Individuals Nonprofit Organizations Corporations Corporate Foundations Other Organizations, such as Donor-Advised Funds Family or individual foundations are generally treated as individuals.	Government Agencies, Partnering Institutions
Purpose	The donor may specify an area of interest or a goal to be funded by with their gift, as well as reporting requirements documenting for the donor how the funds were used.	The sponsor specifies how the funds should be used and requires substantial reporting to governmental agencies.
Value Exchange	The foundation 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 government, achieving government-defined objectives.
Reporting	The foundation has some reporting obligations to document to the donor on how the gift is used or invested. Required 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 perform specific duties such as research, budget reports, progress reports, and return of unused funds.

Proposal Process	Initiated by donors, advancement staff, or faculty members and in response for a request for proposal.	With the assistance of the grant office, grants are submitted in response to a request for proposal, as defined by a government agency.
Document	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	Typically requires specific time period for reporting.	Typically requires a specific time period for conducting projects and reporting back to the sponsoring agency.
Excess Funds	N/A	May be required to return to sponsor.
Penalty for Nonperformance	No penalties for failing to use the funds.	Penalties may exist for failing to use the funds or to deliver the items on a timely basis.
F&A (Facilities and Administrative) Indirect Cost Rates*	Overhead rates are determined by the foundation and built into the grant request.	Overhead rates as determined by the district and allowed by the federal government or other granting agency.

The following guidelines apply to government grant applications.

Criteria for Governmental Grant Applications

Grant proposals and applications are to support the mission and purposes of the district:

- A. Provide quality instruction and support services that allow students to pursue and achieve their educational goals.
- B. Respond to the needs of its students and community by creating new programs and expanding existing programs.
- C. Implement innovative approaches to teaching and learning that prepare students to be productive citizens in a diverse and dynamic world.

Ideally, grant applications will be generated from the results of the institution's annual program review and will be congruent with the Educational Master Plan.

Who Can Author a Governmental Grant Proposal?

Any member of the faculty, staff, or administration is encouraged to research, analyze, and draft a grant proposal based on the above criteria. The following processes have been developed to prevent duplication of efforts and provide guidelines for district-wide support of grants that support the mission of the district.

The vice president, administrative services, as designee for the district, has final signature authority for binding grant agreements and contracts. Individual proposers/applicants are not authorized to enter into legal contracts or agreements.

Initiation of New Governmental Grant

Individuals interested in applying for a new grant must seek institutional approval before submitting a grant application. Individuals interested in applying for a grant should meet with the Grants Coordinator to review and discuss the purpose, criteria, and conditions of the grant. The proposer will then meet with their department chair, director, or supervisor to obtain support for the project. If the appropriate supervisor approves, the proposer will complete a grant contract summary form and routing slip to obtain the approval of his/her dean, the vice president and other involved parties, including vice president, administrative services. Whenever possible, the grant contract summary form will reference initiatives resulting from the annual program review and comprehensive master plan, but it is recognized that not all grant applications will be generated from program review. The routing and approval process for grants is outlined on the grant/contract summary form.

A step-by-step guide for the approval process and a routing slip for signature can be found on the college Web site, under the Grants Web page.

<http://www.miracosta.edu/officeofthepresident/oir/grantsoffice.html>

The following summarizes the approval and routing of new governmental grant applications:

- A. Grants of less than \$100,000, which do not require district contribution or institutionalization, do not require review by Budget and Planning Committee (BPC) or administrator committee, but a brief notification will be sent to BPC as an information item. The process may proceed with the completion of the grant/contract summary form and related signatures.
- B. For new and continuing grants awards in excess of \$100,000 that do not require district contribution or institutionalization, the grant contract/summary form will be presented to the BPC. BPC will review purely in terms of potential impact on the district's general fund, and then forward a recommendation to the administrative council. The administrator committee will then forward a recommendation to the superintendent/president or their designee for approval/disapproval.
- C. For grants of any amount that require district contributions or institutionalization, the grant contract/summary form will be presented to the BPC. BPC will review and then forward a recommendation to the Administrator Committee. The administrator committee will then forward a recommendation to the superintendent/president or their designee for approval/disapproval.

After institutional approval, the proposer may proceed with full grant application. The grant application must comply with proper format, budget requirements and codes as defined by the granting agency. Proposer will forward a copy of the grant application and the grant/contract summary form to the Grants Office and Fiscal Services staff for final budget review.

The district reserves the right to decline any awarded grant funds.

District Impact

The proposer must identify any substantial impact on district resources, including faculty, staff, facilities, fiscal services, information technology, and marketing. Any impacted department must be informed and identify whether it can or cannot support the grant proposal with its current resources. If support is required by district resources (listed above), proposer routes the grant/contract summary form to the appropriate departments/councils for approval before routing to the appropriate dean and vice president for their approval.

Responsibilities

All record keeping, reporting, and retention of records for grant-funded projects or programs is the responsibility of the proposer/project director of the grant. Copies of all applications, face sheets and subsequent reports must be sent to the Grants Office.

The proposer/project director will have responsibility for the application contents and accuracy and ensure that all application and reporting deadlines are submitted timely. If indirect cost is authorized and allowable under the grant, the proposer/project director will ensure that the indirect cost is included in the grant, unless waived by the vice president, administrative services.

Upon approval, the proposer/project director will provide Fiscal Services with a copy of the grant documentation, including the grant-award notification and budget-detail information, and will work with Fiscal Services to establish an appropriate funding source and budget for reporting accuracy and to determine appropriate billing or invoicing to granting agencies. Fiscal Services will assist in providing financial information and back-up documentation to facilitate grants management and control.

Grant activities and funding is not authorized until the district has received the grant-award notification from the funding agency.

Fiscal Services will prepare an agenda item for board of trustees notification on a quarterly basis using the format for board-agenda items developed by the superintendent/president's office.

Allowable and Unallowable Costs

The proposer/project director will assume responsibility to ensure that grant funds are used for program activities approved by the funding agency during the grant period, as identified in the grant-award notification. Proposer/project director will also ensure compliance with federal regulations provided in OMB Circular A-133, as outlined in 6300AP, and any additional applicable regulations.

Conflicts of Interest

To assure there are no conflicts of interest relating to grant management, all principle investigators and project managers, Fiscal Services, and any other departments responsible for grant management will adhere to the standards of 2 CFR §200 as outlined in the National Science Foundation's Proposal and Award Policies and Procedures Guide (PAPPG)- Chapter IX-Grantee Standards.

Ongoing Government Grant Applications and Augmentations to Existing Grants

Grants that have previously been approved through the above process are not required to seek BPC approval unless a new application is required, or substantive changes have been made, including purpose, district contributions, and/or institutionalization. Ongoing grants will still require routing approval through the Grants Office, supervisor, chair or appropriate dean, vice president, and the vice president, administrative services. A step-by-step guide for the approval process and a routing slip for signature can be found on the Grants office website:

<http://www.miracosta.edu/officeofthepresident/oir/grantsoffice.html>

Categorical Programs

Categorical programs that do not require an application are not required to seek institutional approval and are not subject to the Grants Office procedure; however, the divisional dean, the appropriate vice president, and the vice president, administrative services must initial budget proposals or augmentations filed with the state. Notification of budget proposals, augmentations, and expenditure reports are to be forwarded to Fiscal Services for inclusion/revisions in the financial system. Fiscal Services will assist in providing financial information, including appropriate account classification to facilitate program management and control.