

**PHILANDER SMITH COLLEGE**

**TITLE III PROGRAM**

*Strengthening Historically  
Black Colleges and Universities*

**HANDBOOK**

*(POLICIES AND PROCEDURES MANUAL)*

**2012 – 2017**



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## PREFACE

This **Policies and Procedures Manual** is prepared to facilitate the implementation and management of *activities* funded under the **Title III Grant at Philander Smith College**. This *document* is intended to be a *guide* to Title III and College personnel in understanding the programmatic duties and responsibilities of Philander Smith College in the administration and management of the Title III Grant.

In support of our compliance efforts, the **Manual** will serve as a *reference* to Activity Directors and other key personnel in carrying out the *objectives* and *implementation strategies* of the *approved Plan of Operation*. Activity Directors and all administrators who sign-off on expenditures, reports, and time sheets should refer to this **Manual**. It is to be used as a *guide* for ensuring that all *regulations* of the Title III Program are followed.

The **Manual** provides *Policies and Procedures* which *will* ensure that the following tasks are accomplished:

- (1) That **resource-use** is consistent and in compliance with the *Policies and Procedures* of Philander Smith College **and** the *legislation and regulations* of the U.S. Department of Education;
- (2) That **grant resources** are safeguarded against waste, loss, and misuse;
- (3) That **reliable data** are obtained, maintained and accurately reported;
- (4) That **personnel** are of a quality commensurate with their responsibilities;
- (5) That **records** are adequate to support that the College essentially carries out the grant as described in the application (or as appropriately modified); and
- (6) That our **system of authorization and documentation** is adequate to provide effective and efficient accounting control over revenues and expenditures.

It is **not** possible to anticipate all of the questions or issues that *may* arise as related to the Title III Program. Therefore, this **Manual** contains a broad overview of Title III *regulations*. In some instances, faculty and staff *will* be referred back to their respective **Faculty or Staff Handbook/Manual** for additional information. In other situations, the Office of Title III *will* provide direct assistance in answering technical questions or solving problems.

Administrative procedures for the Title III funded *Activities* follow the *approved* policies and practices of Philander Smith College. However, *Federal regulations* may conflict with current College policies and practices. In all cases, *Federal law* **will supersede** policies and practices of Philander Smith College.

**The Title III Office *should* be consulted in events (that questions arise) which are not covered in the Policy Manual.**

Compliance with the *guidelines* and *regulations* included in this **Manual** *will* ensure that this grant is administered in accordance with Title III, Part B regulations, the United States Department of Education General Administrative Regulations (EDGAR), Office of Management and Budget (OMB) Circulars, Federal Register, and Policies of Philander Smith College.

This **Manual** will be updated regularly as changes in policies and procedures are made by the U.S. Department of Education and/or Philander Smith College.

## THE TITLE III PROGRAM

### STRENGTHENING HISTORICALLY BLACK COLLEGES AND UNIVERSITIES PROGRAM

The Strengthening Historically Black Colleges and Universities Program, often referred to as Title III, is funded under the *Higher Education Act of 1965* (HEA), as amended. The *Higher Education Act* was legislation signed into United States law on November 8, 1965 as part of President Lyndon B. Johnson's *Great Society* agenda.

The *purpose* of Title III, Part B, is to provide financial assistance to Historically Black Colleges and Universities, to assist these institutions in **establishing and strengthening their physical plants, academic resources, fiscal management, and endowments**, so that they *may* continue to participate in fulfilling the *goal* of equality of educational opportunity. More specifically, the Title III Program assists institutions like Philander Smith College in funding developmental activities that *will* help the College fulfill its mission.

### STUDENT AID AND FISCAL RESPONSIBILITY ACT (SAFRA)

The House of Representatives passed H.R. 3221 ("The Student Aid and Fiscal Responsibility Act of 2009") on September 17, 2009. H.R. 3221 amends HEA, Title III, Part F to annually provide \$255 million in mandatory funding for historically Black colleges and universities (HBCUs) and other minority-serving institutions (MSIs) for FY2010 through FY2019.

### THE MISSION OF PHILANDER SMITH COLLEGE

The College's *mission* is to graduate academically accomplished students, grounded as advocates for social justice, determined to change the world for the better.

### RELATIONSHIP OF TITLE III ACTIVITIES TO THE MISSION OF THE COLLEGE

All selected Title III *Activities* support the *mission* and *goals* of the Institution. Each *Activity* is governed by a set of *objectives*, and each *objective* relates specifically to one or more of the Institution's *long-range goals*. The Title III Program helps to bridge the financial gap for activities **not** financially possible through the College's operational budget. Thus, the Title III grant *supplements* the College's budget.

### HOW TITLE III FUNDS ARE ALLOCATED

Funds are *allocated* by a formula which is based upon the number of *Pell Grant* recipients at the institution; the number of bachelor degree recipients of the institution; and the number of students who graduated from the institution and have been admitted to and are in attendance at a graduate or professional school.

### LEGISLATION AND REGULATIONS THAT APPLY

#### Legislation:

- Title III, Part B, Section 321-327 of the Higher Education Act, as amended
- Title III, Part F, Section 371 of the Higher Education Act, as amended

#### Regulations:

- 34 CFR part 608
- Education Department General Administrative Regulations (EDGAR) Parts 74,75, 77, 79, 81, 82, 84, 85, 86, 97, 98, and 99

**Guidance:**

- Office of Management and Budget Circulars (OMB) A-21; A-87; A-122  
Link to Legislation and Regulations:  
<http://www2.ed.gov/programs/iduestitle3b/index.html>: Listed under: Laws, Regulations, and Guidance
- A-133 Audit Requirements

**WHAT ACTIVITIES MAY BE CARRIED OUT UNDER THE GRANT?**

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

- Purchase, rental, or lease of scientific or laboratory equipment for educational purposes, including instructional or research purposes;
- Construction, maintenance, renovation, and improvement in classrooms, library, laboratory, and other instructional facilities, including purchase or rental of telecommunications technology equipment or services;  
**Note:** A *grantee* shall **not** use more than fifty percent (50%) of its grant for constructing or maintaining a classroom, laboratory or other instructional facility.
- Support of faculty exchanges, faculty development, and faculty fellowships to assist faculty members in attaining advanced degrees in their fields of instruction;
- Academic instruction in disciplines in which Black Americans are underrepresented;
- Purchase of library books, periodicals, microfilm, and other educational materials, including telecommunications program materials;
- Tutoring, counseling, and student service programs designed to improve academic success;
- Funds and administrative management, and acquisition of equipment for use in strengthening funds management;
- Joint use of facilities, such as laboratories and libraries;
- Establishing or improving a development office to strengthen or improve contributions from alumni and the private sector;
- 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;
- Establishing community outreach programs that will encourage elementary and secondary students develop the academic skills and the interest to pursue postsecondary education;
- Establishing and maintaining an institutional endowment;
- 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 financial literacy and economic literacy of students or the 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 Secretary, except that not more than two percent of the grant amount may be used.

### UNALLOWABLE ACTIVITIES

The following activities are *unallowable* and **cannot** be carried out under this grant (34 CFR, Subpart B, Paragraph 608.10):

- Activities that are **not** included in the grantee’s approved application;
- Activities that are **not** approved by the Secretary;
- Activities that are **inconsistent** with any State plan for desegregation of higher education that is applicable to the institution;
- Activities or services that relate to sectarian instruction or religious worship; and
- 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 into some other religious vocation, or to prepare them to teach theological subjects.

### WHAT COSTS ARE UNALLOWABLE?

- Developing or improving non-degree or non-credit courses other than **basic skills development courses**.
- Developing or improving community-based or community services programs, unless the program provides academic-related experiences or academic credit toward a degree for students.
- Purchase of standard office equipment, such as furniture, file cabinets, bookcases, typewriters, or word processors.
- Payment of any portion of the salary, office expenses, or travel of a president or equivalent officer who has college-wide administrative authority and responsibility to fill a position under the grant such as project coordinator or activity director.
- Costs of organized fund-raising, including financial campaigns, endowment drives, solicitation of gifts and bequests, and similar expenses incurred solely to raise capital or obtain contributions.
- Costs of student recruitment such as advertisement, literature and college fairs.
- Services to high school students unless your college is a Hispanic-serving institution or Tribal college.
- Instruction in the institution’s “standard” courses as indicated in the institution’s catalog.
- Costs for health and fitness programs, transportation, and day care services.
- Student activities such as entertainment, cultural, or social enrichment programs, publications, social clubs, or associations.

- Activities that are **OPERATIONAL** in nature rather than **DEVELOPMENTAL**.
- Supplanting, with grant funds, funds that would otherwise be available for the activities to be carried out under the grant.
- Indirect costs.
- Individual memberships in business, technical, and professional organizations – **Only institutional memberships are allowed.**

**PHILANDER SMITH COLLEGE ACTIVITIES CURRENTLY FUNDED  
UNDER Title III, Part B  
2012 – 2017**

<b>Activity Number</b>	<b>HBCU FUNDED ACTIVITY</b>	<b>Activity Director</b>
I	<i>Academic Success and Student Retention</i>	Dr. Lois Sheer
II	<i>To Improve Academic and Co-curricular Services through the Center for Student Services</i>	Ms. Rhonda Lovelace
III	<i>To Strengthen and Enhance the Music Department</i>	Mr. Timothy Tucker
IV	<i>To Improve the Quality of Teacher Education By Implementing a Model Classroom and Lab</i>	Dr. Betty Dickson
V	<i>Strengthening Institutional Accreditation</i>	Dr. Annie Williams
VI	<i>Strengthening Campus Information Services</i>	Mr. Brian Clay
VII	<i>To Improve Academic and Student Services through Scholarship and Study Abroad Opportunities</i>	Ms. Amanda Robinson
IX	<i>Campus Center Construction</i>	Mr. Terry Wallace
X	<i>Title III Project Management</i>	Mr. Alvin Anglin
<b>Activity Number</b>	<b>SAFRA FUNDED ACTIVITY</b>	<b>Activity Director</b>
I	<i>To Improve Academic Quality through Strengthening Library Collections, Archives, and Information Competence</i>	Ms. Teresa Ojezua
II	<i>Strengthening the Development Office</i>	Mr. C.J. Duvall
III	<i>Strengthening the Computer Science Degree through Accreditation</i>	Dr. Samar Swaid
IV	<i>Campus Center Construction</i>	Mr. Terry Wallace

## ADMINISTRATIVE STRUCTURE

### ROLE OF THE PRESIDENT

Overall leadership responsibility for the Title III Program at Philander Smith College is vested in the President of the College. The President has delegated the authority for day-to-day management of the project to the Title III Director. The Title III Director reports directly to the Associate Vice President for the Office of Institutional Effectiveness and Planning and works directly with the other Vice Presidents and the Activity Directors to ensure that all project objectives are achieved as written in the grant.

### ROLE OF THE TITLE III DIRECTOR

The Title III Director is responsible for the **overall implementation and management** of the Title III grant, including conformance with **all** applicable *Federal* and College regulations. The Director ensures that the President's vision and priorities are reflected in all **Activities** approved for funding, and serves as the President's official agent on **all** Title III matters.

### THE TITLE III DIRECTOR HAS THE FOLLOWING RESPONSIBILITIES:

- Act as a liaison between the U.S. Department of Education and Philander Smith College;
- Ensure that the implementation process for Title III *Activities* **is** consistent with the regulations governing Title III, as well as with College *Policies and Procedures*;
- Facilitate the establishment of effective lines of communication to ensure that the Title III project operation **is** consistent with the *goals* of overall institutional development, institutional self-sufficiency, and the grant's objectives;
- Provide leadership for integrating **all** *Activities* in the project with **all** other College operations;
- *Approve* **all** grant expenditures, and maintain adequate authorization and audit trail records for **all** such expenditures;
- Coordinate internal and external evaluations to assess program impact;
- Work in collaboration with the Office of Fiscal Affairs to ensure that an efficient system for fiscal controls and routine reporting of Title III funds **is** maintained;
- Communicate with the Title III Grant Program Officer in Washington, DC on **all** aspects of the program;
- Report progress on *Activities*, including successes and problems to the Associate Vice President for the Office of Institutional Effectiveness and Planning and the College President;
- Refine or revise objectives of the Title III *Activities* as necessary, and seek authorization from the U.S. Department of Education for implementation or changes;
- Conduct scheduled Title III staff meetings to assist Activity Directors in solving problems with achieving objectives, and keeping them informed of policy changes;
- Use Quarterly Reports to monitor progress toward objectives and institutional impact of each *Activity*; and

- Integrate the Title III *objectives* and *Activities* into the College's Strategic Planning Process.

### **ASSISTANT DIRECTOR**

The Title III Assistant Director **assists** the Title III Director in providing the **daily management** of the Title III Program. The Assistant Director has the following responsibilities:

- Maintain copies of award letters and budgets;
- Prepare financial reports;
- Review all purchase orders from Activity Directors to make sure **all** costs are allowable, allocable, and reasonable **prior** to signing by the Title III Director;
- Prepare check requests for payment of all invoices;
- Submit purchase orders and check requests to the PSC Business Office;
- Prepare regular expenditure updates for the Title III Director and each Activity Director;
- Assist the Director in preparing the College's Annual Title III *Phase I Report*, *Phase II Report*, and *Annual Performance Report (APR)*;
- Serve as a liaison to Activity Directors, assisting them with issues regarding individual *Activity* budgets and other programmatic issues; and
- Respond to, and carry out any required duties when the Director is not available.

### **Activity Directors**

The Activity Directors are responsible for **(1)** carrying out the approved **Plan of Operation** contained in the funded Title III Grant, and **(2)** achieving the identified **Objectives** in their respective *Activities*.

### **ACTIVITY DIRECTORS HAVE THE FOLLOWING RESPONSIBILITIES:**

1. Attend (on-campus) Title III meetings.
2. Prepare and complete accurate reports of *Activity* progress for submission to the Title III Director's Office (i.e., *Quarterly Activity Progress Reports*; *Annual Performance Reports [APR]\**; related *travel reports*; *Time and Effort Documentation Reports*; and *equipment inventories*).
3. Request Title III funds in accordance with approved *Activity* allocations and College procedures.
4. Prepare, review, and sign *Time and Effort Documentation Reports*.
5. Develop strategies for the completion of *objectives* in a timely manner.
6. Monitor *Activity* budgets, and sign-off on **all** approved budget expenditures.
7. Provide Title III Administration with the personnel documents on each person hired and/or terminated, who receives salaries under Title III.
8. Perform *other* duties, which *may* be **necessary** to ensure that *objectives* of the *Activity* are achieved.

The Activity Director *shall* maintain a copy of the original **Plan of Operation** for the grant; copies of all reports made to the Title III Office during the grant period; copies of all purchase orders and invoices submitted; and copies of any correspondence related to the *Activity*.

The Activity Director **is** responsible for managing the budget for the *Activity*. Therefore, all Activity Directors *shall* also keep in their files a copy of their *approved Activity budget* (with any budgetary changes).

The Activity Director *must* maintain a list of Title III personnel under the *Activity*. The personnel list *shall* be maintained along with a copy of the job description for each person.

All funds awarded for a specific budget period are intended to achieve the objectives of that *Activity* for that budget period. Only the Activity Director *may* initiate requests for use of funds and the requests *must* be based upon the *approved* budget. Each Activity Director *must* have their requests *approved* by the Vice President for the area within the existing administrative structure of the College before the requests are submitted to the Title III Administrative Office.

The Activity Director *shall* be responsible for the day-to-day management of **all** tasks within their respective *Activity*. The Activity Director monitors the staff and coordinates their tasks under the *Activity*.

The Activity Director **is** expected to submit *activity monitoring reports* of key personnel under the *Activity*. In some cases, the Activity Director *may* be requested to combine **all** the reports from the key personnel and submit them under one comprehensive report. Activity Directors *shall* prepare other reports as deemed necessary.

Activity Directors *shall* maintain an inventory of **all** equipment, and *will* be requested each year to update the Title III inventory of equipment. As new items are purchased, the appropriate information *shall* be sent to the Title III Office and recorded in the records of the *Activity*.

## OVERVIEW OF TITLE III GRANT MANAGEMENT

The U.S. Department of Education **requires** the College to maintain records that show the amount of funds awarded under each grant; how the spending of funds relates to the overall effectiveness of the institution; how the grant funds were used; the total scope of the project; and other records to aid in facilitating an effective audit. The College **must** keep records that demonstrate *compliance* with Program requirements and records that show significant project expenses and results. These records **must** be retained for **five (5) years** after the final financial reports are submitted for the *Activity* for which the funds were granted.

**Site Visit:** Site visits *may* be made by representatives of the U.S. Department of Education to: (a) review program accomplishment and management control systems, and (b) provide such technical assistance as *may* be required.

**Monitoring by Recipients:** Recipients *shall* constantly monitor the performance under the *federally supported Activities* (to assure that adequate progress is being made toward achieving the *goals* of the *Activity*). Monitoring of the *Activities* by the Title III Office *will* include: an overview of the progress of each *Activity* in accomplishing the *goals* on the **timetables** that have been established; a review of the monthly *Time and Effort Reports* submitted by each staff that receives compensation under the Title III Program; and an *audit* conducted of **all** equipment and inventory. This review *shall* be made for each function or *Activity* as set forth in the *approved* grant application or contract document.

**Records Related to Grant Funds:** A grantee *shall* keep records that fully show: (a) the amount of funds under the grant; (b) how the grantee uses the funds; (c) the total cost of the project; and (d) the share of the cost provided from other sources.

**Records Related to Compliance:** A grantee *shall* keep records to show its compliance with program requirements. Compliance encompasses the processes of systematic procedures that are organized and efficient methods, and ensures that the provisions of the regulations – imposed by a **federal** agency – are appropriately met.

**Records Related to Performance:** A grantee *shall* keep records to identify significant project experiences and results, and use the records to (a) determine progress in accomplishing project objectives; and (b) revise project objectives, if necessary. Accurate records *will* document successes, problems encountered, and timeframes in the delivery of the desired outcomes and/or results.

**Records Retention Period:** Unless a longer period is required under 34 CFR part 74, a grantee *shall* retain records for **five (5) years** after the completion of the Activity for which it uses grant funds. Accessibility of the records is important for audits that *may* be conducted by internal and external entities.

**Unexpended Funds:** In the event that the amounts previously awarded have **not** been obligated – pursuant to the *approved* project and in the judgment of the Secretary – *will not* be obligated for such purposes, the Secretary (U.S. Department of Education) *may, upon* notice to the recipient, reduce the amount of the grant **or** contract to an amount consistent with the recipient’s needs pursuant to regulations regarding termination and suspension for cause.

**Termination and Suspension for Cause:** Assistance under any *Federal* program to which this part is applicable *may* be terminated, in whole or part, if the Secretary determines, after affording the recipient reasonable notice and an opportunity to be heard, that the recipient has failed to carry out its *approved* project proposal in accordance with the applicable law and the terms of such assistance, or has otherwise failed to comply with the *law, regulations, assurance, term or condition* of the grant or contract.

**Reports of Progress in Achieving Title III Objectives:** *Recipients shall monitor the performance of the grant-supported Activities, and report progress according to program requirements.* The evaluation *should* review programmatic progress to assure that positive efforts are being made toward achieving the goals of the grant. **Internal audit evaluations** *will* be carried out through *Quarterly Monitoring Reports, Annual Progress Reports, and Semi-Annual Title III Workshops.* **External evaluation** is recommended annually. External evaluation *will* determine progress in achieving the objectives in its approved application; the effectiveness of the project in meeting the purposes of the program; and the effect of projects on the persons directly impacted by the projects.

**Quarterly Progress Reports:** In order to provide systematic documentation of the achievement of objectives for each of the grant *Activities*, each Activity Director *will* complete a **Quarterly Progress Report**. The report **is** to be placed on the forms provided by the Title III Office. **Quarterly Progress Reports** are due according to the schedule that follows:

<b>QUARTERLY PROGRESS REPORT</b>	<b>TIME PERIOD</b>	<b>DUE DATE</b>
First Quarterly Report	October 1 – December 31	January 15
Second Quarterly Report	January 1 – March 31	April 15
Third Quarterly Report	April 1 – June 30	July 15
Fourth Quarterly Report	July 1 – September 30	October 15

**\*\*\*\*\*FAILURE TO SUBMIT QUARTERLY PROGRESS REPORTS BY THE NOTED DUE DATES MAY RESULT IN AN ACTIVITY BEING TEMPORARILY SUSPENDED\*\*\*\*\***

***Annual Performance Report:*** In addition to the **Quarterly Progress Report**, each Activity Director *will* submit an **Annual Performance Report (APR)**. This *report*, **due no later than October 31st of each year**, *must* provide the necessary information and data to compile the **U.S. Department of Education’s Annual Performance Report (APR)**.

***External Evaluation:*** An **independent external evaluator** *will* evaluate the Title III grant as well as the individual Title III *Activities*. The evaluator *will* conduct both a **formative** and a **summative evaluation**. Evaluators *will* look at **all** aspects of grant *Activities*, including (1) a comparison of actual accomplishments to the goals established for the period; (2) documentation of *Activity* progress in meeting measurable objectives; (3) allowability of project expenditures; and (4) the effect of the project on strengthening the overall operation of the College.

## **ADMINISTRATION AND OPERATIONAL POLICIES**

### **ROLE OF THE BUSINESS OFFICE**

The Business Office *shall* establish fiscal controls and fund accounting procedures to assure proper accounting for the receipt and disbursement of all Title III Funds received by the College. All Title III transactions *shall* be made in accordance with prevailing federal and/or PSC Institutional regulations, to provide for a timely audit of all funds, and to leave a *proper audit* trail for this purpose. The College *shall* use its existing accounting, disbursement, and purchasing procedures, provided these policies encompass the fiscal management requirements stated in *the federal regulations*.

The Business Office *shall* be responsible for the following:

- Ensuring timely and sufficient “drawdowns,” advance payments, or reimbursements of project funds from the U.S. Department of Education;
- Establishing separate and identifiable accounts for Title III funds. A separate account shall be established for each *Individual Project Activity* and one for *Project Administration*;
- Keeping all fiscal records required by the U.S. Department of Education, the institutions governing body and/or its legislated authority;
- Providing the Title III Director with periodic (monthly recommended) statements of all project expenditures;
- Working with the Title III Director to execute any necessary budget amendments;
- Preparing and timely submitting final reports required by the U.S. Department of Education;
- Consulting with the Title III Director on the justification of any project expenditure when there is any question as to allowability;

- Working with the Title III Director to establish and enforce fiscal documentation systems needed for project accountability. These should include such items as accounting for release-time, prorated salaries, matching costs, etc.; and
- Coordinating the *Annual A-133 Audit*.

## BUDGET PROCESS

Each Activity Director *will be provided with an annual line item budget and monthly budget updates*. The **budget updates** *should* be carefully reviewed and compared with the records and documentation maintained by the Activity Director. Any discrepancy noted *should* be shared with the Title III Director. Efforts to resolve the discrepancy with the Business Office *will* be coordinated through the Title III Office.

Periodic **budget analysis** *should* be conducted by Activity Directors to ensure that Title III funds are being spent in a timely and efficient manner. Funds *should* be utilized in a manner that ensures that the *objectives* of the *Activity* are accomplished. **Therefore, the budget must be tied to the approved program plan and consistent with the intent of the U.S. Department of Education in carrying out the objectives of Title III.** Any deviations or discrepancies *should* be explained in the *Quarterly Reports*.

## BUDGET TRANSFERS

34CFR [74.25] of EDGAR allows the transfer of funds from one *Activity* to another during a grant year with the *approval* of the Title III Director.

All budget transfer requests:

- Must be to carry out *Activities* that are within the **approved scope** of the application;
- Must meet the test of being **reasonable**, and **allowable**; and
- Must **meet all other Federal statutes, regulations, and grant conditions**.

## BUDGET REVISIONS

To request a *budget revision*, please obtain and complete a *Budget Revision Request Form*. Return the completed form with the appropriate information and signatures to the Title III Office for *review* and *approval*.

Activity Directors are expected to carefully monitor their *program objectives* and *related expenditures* to **ensure that milestones are being met in a timely manner and that expenditures are commensurate with accomplishments**.

## CARRY FORWARD (CARRYOVER) FUNDING

At the end of each grant year (September 30), unexpended funds are *carried forward* to the preceding fiscal year. These funds are made available for projects that are consistent with the theme of the College's Title III grant. Requests for use of these funds *must* be consistent with the **allowable** uses of Title III funding, as established in Section 323 (a) of the Higher Education Act of 1965, Part B – *Strengthening Historical Black Colleges and Universities*. **All requests must be approved by the Title III Director.**

To request *Carry Forward (Carryover) funds*, please submit a written request detailing the following:

- **Need for the funding;**
- **Explanation detailing whether or not the request is tied to an existing Title III Activity;**
- **Specific, measurable outcomes;**
- **Justification that support the budget request; and**
- **Brief summary of the benefits to the College.**

#### **FISCAL POLICIES AND REGULATIONS**

**No commitments**, which require the use of the Title III funds and are **not** specifically included in the *approved* Title III **Plan of Operation** shall be made.

**All funds awarded under Title III shall be spent according to the approved program plan.** All expenditures *should* be evaluated by the Activity Director to determine if they are **allowable**, **allocable**, and **reasonable**. See definitions that follow:

***Allowable:** The cost must conform to any limitations or exclusions set forth in the approved program plan or in the Federal Cost Principles;*

***Allocable:** The cost will be incurred solely to support or advance the work of a specific approved program plan; and*

***Reasonable:** The cost must be able to withstand public scrutiny, i.e. objective individuals not affiliated with the activity would agree that a particular cost is appropriate.*

Requests involving expenditures from the Title III budgets *must* be forwarded to the Title III Office to ensure availability of funds *prior* to submission to the Business Office for *final* processing and *prior* to making any commitments.

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

The College is required to spend Title III funds in a manner consistent with the provisions of the final *approved* operating plan. If modifications are *necessary* to the **objectives** and **milestones** of a particular *Activity*, such changes *should* be reflected in budgetary revisions. **Budget revisions must be within Federal guidelines and must have the approval of the Title III Director and the Supervising Vice President.**

#### **RECONCILIATION OF FISCAL RECORDS**

Duplicate copies of records of all purchases and/or expenses acquired with Title III funds are kept by the Office of Title III (purchases orders, invoices, encumbrances, budgets, uncommitted funds, copies of paid/cancelled checks, etc.). On a monthly basis, the Business Office provides the Office of Title III with a computerized record of **all** fiscal activity initiated on behalf of the Title III Program. The records of the Business Office and the records of the Office of Title III are compared to determine differences. Any difference between records is **evaluated**, **researched**, and **reconciled**.

## PURCHASING RULES/REGULATIONS

The purchase of goods and services is governed by the *policies* of Philander Smith College, and is established through the use of Purchase Orders. **All** purchases require *prior approval* by the Title III Director and *must* be justified based on the *goals* of the *Activity* before it can be approved.

### REQUESTS FOR EXPENDITURES OF FUNDS UNDER THE TITLE III PROGRAM MUST FOLLOW THIS PROCEDURE:

1. Secure a *Purchase Order* form from the Title III Office.
2. Complete the form in *triplicate*—
  - Indicate *Activity #* and *Objective #* (if possible);
  - Include the **vendor's name and complete address**;
  - Provide *Line Item number* (expenditure code);
  - Complete the **quantity, description, costs, etc. of the goods/services to be purchased**;
  - **Sign your name in full** where requested—**name written in its entirety**;

**Note:** Only the Activity Director or an authorized person *should* sign the “Requested by” box on the *Purchase Order*, otherwise the *Purchase Order* will be returned to the sender.

- Secure the *approval* (signature **not** initials) of the **appropriate Cabinet level supervisor**. (If the Activity Director is a member of the President's Executive Leadership Team, the President *should* “sign off” on the request); and
  - An authorized representative of Computer Information Services (CIS) *must approve* and “sign off” on **all** computer purchases.
3. Submit the completed *Purchase Order* to the Title III Office along with an estimate, invoice, brochure, or statement of explanation. Under **no** circumstance *should* a business arrangement be made with an outside vendor without satisfying **all** internal administrative requirements.
  4. The Title III Office will process the *Purchase Order* by verifying the (a) availability of funds; (b) reviewing the attachments; and (c) verifying the Title III Activity “Account Code.” If additional information is needed, contact *will* be made with the person making the *request*. **Before the Purchase Order is submitted to the Business Office, it will be signed by the Title III Director or Assistant Director.**
  5. The *Purchase Order* is then delivered to the Business Office. After a *Purchase Order* number is assigned to the *Purchase Order* by the Business Office, two (2) copies are returned to the Title III Office. The Title III Office *will* forward a copy to the person requesting the goods or services. This person is then responsible for ordering the goods or services.
  6. **When there is a problem with the delivered goods and services (not in good working order, partial delivery, cancellation, or inferior substitution), please notify the Title III Office as soon as possible. This will prevent payment of the goods and services until the problem is remedied.**

7. Vendors *should* mail all *receipts* or *invoices* for expenditures to the Business Office. They will be forwarded to the Title III Office.
8. Upon receipt of invoices, *Check Request Vouchers* are prepared with the proper account codes for expenditures and submitted to the Business Office.
9. Checks are “cut” and mailed by the Business Office. Other details for completion of each transaction are handled between the Business Office and the Title III Office.
10. **Checks are run once a week on Wednesdays.** Invoices and check requests received by the end of the day on Monday are processed that week. Those requests received subsequently *will* be processed the following Wednesday. Immediate checks are available only in emergency situations and require the *approval* of the Controller or the Vice President for Fiscal Affairs.
11. Every reasonable effort *should* be made to obtain the best possible quality, service, and price. For larger non-routine purchases and contracts, competitive proposals *should* always be solicited and evaluated. Even for routine purchases, vendor prices *should* be checked periodically with those of reliable competitors.

#### **PURCHASE OF FURNITURE/EQUIPMENT/SUPPLIES**

##### **THE U. S. DEPARTMENT OF EDUCATION DEFINES EQUIPMENT AND SUPPLIES AS FOLLOWS:**

*“Equipment means tangible nonexpendable personal property including exempt property charged directly to the [grant] award, having a useful life of more than one (1) year, and an acquisition cost of \$5,000 or more per unit. However, consistent with recipient policy, lower limits may be established.” (EDGAR, paragraph 74.2)*

*“Supplies mean all personal property, excluding equipment, intangible property, and debt instruments as defined in this section, and inventions of a contractor conceived or first actually reduced to practice in the performance of work under a funding agreement...” (EDGAR, paragraph 74.2)*

##### **WHEN PURCHASING EQUIPMENT/SUPPLIES THE FOLLOWING RULES AND REGULATIONS APPLY:**

1. The same procedure *must* be followed as established by the College.
2. After the decision is made relative to equipment/supplies purchase, the “Purchase Order” procedures mentioned previously *must* be followed. Items *should* **never** be secured or delivered **before** a *Purchase Order* **is** approved.
3. Within five (5) business days of equipment being purchased and delivered, the appropriate information (acquisition date, description of the item, manufacturer’s serial number, make, model, and cost) *must* be submitted to the Title III Office for inventory purposes. Activity Directors *must* also document this information as part of their own inventory.
4. The Title III Office *will* make contact thereafter, for the equipment to be checked and affixed with a bar code. A control system *shall* be in effect to ensure adequate safeguards to prevent loss, damage, or theft of equipment.

5. **Notify** the Title III Office, of **all** missing Title III purchased equipment/supplies as soon possible (after the discovery of the missing items). If possible, the Activity Director or office supervisor *may* ascertain why an item is missing (borrowed without permission by other faculty/staff, loaned to other campus activity/office/division, or theft).
6. Any loss, damage or theft of equipment/supplies *shall* be investigated by campus and/or Little Rock Police Department, and a report submitted to the Title III Office.
7. Records *shall* be maintained and the Title III Office notified of **all** equipment/supplies loaned for more than one week from one office/division to another **or** from one *Activity* to another *Activity or* office/division.
8. Each Activity Director or office/division *shall* maintain an inventory of **all** Title III purchased equipment related to their *Activity*. A physical inventory of equipment *must* be conducted at least once every two years and the results reconciled with the property records of the Title III Office. This is necessary to verify the existence, current utilization, and need for the equipment. Any differences between quantities determined by the physical inspection and those shown in the inventory records *shall* be investigated to determine the cause of the differences.
9. Title III purchased equipment *shall not* be removed from the Philander Smith College campus without the *written approval* of the Title III Director. **Exception:** Laptop computers, especially those purchased for loan/use by staff and faculty away from the campus. Care *should* be taken to keep secure any item used off campus. It is understood that the item remains the property of the Title III Program of Philander Smith College.
10. Adequate maintenance procedures *shall* be implemented to keep the equipment in good working condition.
11. Students or school personnel *may not* be charged for the ordinary use of equipment or supplies purchased with Title III grant funds.
12. Grantees *should* purchase supplies from Title III funds only in amounts reasonably expected to be required for the performance of grant *Activities*.
13. Supplies *should* be procured on a timely basis to reflect use of supplies during the period of Grant support.
14. Although there is **no** requirement or accountability for supplies similar to that for the equipment, the grantee is expected to maintain records that support the purchase, receipt, and proper charging of supplies in accordance with good management practices.

#### **DISPOSAL OF EQUIPMENT/SUPPLIES**

When equipment is **no** longer needed for the original *Activity*, or the equipment is **not** in good working order and *cannot* be repaired, the following steps *should* be taken:

- ✓ Notify the Title III Office of the discontinued use of equipment/supplies, and provide the reason (no longer needed or not in good working order, etc.) in writing.
- ✓ Provide the serial number and/or other identifying information.
- ✓ The Title III Office *will* provide written instructions for the transfer of the equipment.

#### **FURNITURE PURCHASE**

Purchases of standard office furniture (file cabinets, bookcases, chairs, etc.) are **unallowable** as direct charges, except where *approved in advance* by the sponsoring agency. An exception to

the rule *would* be in the case of the setting up of a *new Activity*. Otherwise, if an Activity Director requests the purchase of any office furniture, and it is **not** listed in the proposed budget submitted and approved by the U. S. Department of Education, a **special request** *will* need to be made to the U. S. Department of Education, even when funds are available in the *Activity budget*.

## PROCUREMENT

### ***Competitive Bidding***

**Competitive bidding** is generally *required* for purchases, leases and contracts **over \$25,000**. To the extent practicable, a written statement detailing the goods or services required *should* be provided to vendors. It is recommended that **at least three (3) written bids** be obtained and evaluated. Awards *should* be made to the vendor whose bid or offer is most advantageous to the College, considering price, quality, service and conformance to specifications.

Formal competitive bidding *may not* be appropriate in certain exceptional cases; for example, where the item is a highly specialized piece of equipment (or service) that is only available from one source, or due to legitimate extenuating or emergency circumstances. Authorization for exceptions to omit formal competitive bidding for items over \$25,000 *should* be made by the Vice President for Fiscal Affairs.

### ***Sole Source***

**Sole Source Procurement** occurs when only one (1) vendor is known to supply a particular item or service requested for purchase. This method of purchasing involves **no competition** and *should* be avoided as much as possible. If used, the **sole source** procurement *should* be justified and well documented. Evidence of such documentation *should* be retained for record keeping purposes.

Final responsibility in determining whether an item is a proprietary item **and** *should* be purchased from a sole source is determined by the Vice President for Fiscal Affairs.

Documentation of competitive bidding (or justification why competitive bidding was **not** used) *must* be included in **all** requests for *approval* of purchases that exceed \$25,000, along with the related *Purchase Order or Check Request*. For smaller purchases, documentation *should* be kept on file at the departmental level or in grant records.

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

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

Development Agency in the solicitation and utilization of small businesses, minority-owned firms and women's business enterprises.

In all cases, the procurement process **must** be in conformance with **EDGAR, Sections:**

- 74.44 Procurement procedures
- 74.45 Cost and price analysis
- 74.46 Procurement records
- 74.47 Contract administration
- 74.48 Contract provisions

### ***Signing Contracts***

The College President **and** the Vice President for Fiscal Affairs are the **only** Philander Smith College signers with authority to sign ANY contract to which the College is a party.

## **ADMINISTRATIVE POLICIES AND PROCEDURES**

### **HIRING OF TITLE III PROGRAM PERSONNEL**

The Title III Director *must* be consulted to ensure that the hiring of persons for Title III Activities is within the framework of the **approved Plan of Operation**, and to ensure that appropriate funds are available to accommodate the action. **Title III funds *may not* be used to supplant the use of College funds in the hiring process.**

Personnel are to be hired in a nondiscriminatory manner according to the provisions stated in Philander Smith College's Procedural Manual. The personnel categories include:

- All faculty and staff whose salaries are supported by Title III funds.
- All Activity Directors regardless of whether their salary is supported by Title III funds.
- Other faculty and administrative staff who have been designated specific responsibilities for aspects of the Program.

### **THE FOLLOWING ACTIONS MUST BE COMPLETED FOR ALL PERSONS BEING PAID WITH TITLE III FUNDS:**

- Prior to any interview or filling of a position that *will* be funded by Title III, the position must be advertised before any hiring decisions;**
- A "***Request for Hire***" form **must** be initiated by the Activity Director and routed to the appropriate Vice President and supervisor for initial *approval*. Once approved, the *form should* be routed to the Title III Director for *approval* of the source of funding. The Title III Director *will* then forward the application to the Vice President for Fiscal Affairs for his/her signature and processing by Human Resources;
- Final approval *must* be granted by the President, *prior* to the employment of any individual receiving salary under Title III;
- Before a new employee (faculty or staff) *can* begin working, the employees ***must*** receive a letter of appointment from the appropriate College official (President, Vice President of Academic Affairs or HR Office);
- All** new employees *must* complete form W-4 (Employee's Withholding Allowance Certificate) for federal tax purposes and have form I-9 (Employment Eligibility

Verification) completed and verified as required by the U.S. Department of Justice before they will be put on the payroll. Each College benefit for which an employee is eligible requires an application or enrollment form completed by the employee before enrollment is complete. These include medical insurance, medical and dental plans, retirement plans, life insurance and long-term disability (contact Human Resources to discuss benefit plans and to obtain the appropriate forms). The **Activity Director must** provide the Office of Title III with the name of the person hired, his/her title and job description, a resume, and other required documents within five (5) workdays *prior* to the date of hire;

- It should be noted that the College is **not** obligated to offer appointed personnel the budgeted salary amount. Salaries are based on equity, expected duties and responsibilities, experience and qualifications needed to perform the assigned duties in a particular position; and
- Individuals hired *should* clearly understand that they are being supported by ***Federal funds*** and that their employment is contingent on the receipt of those funds and the overall success of their ***Activity***.

#### **EMPLOYEE CHANGES IN TITLE OR POSITION OR TERMINATION**

When employment terminates, regardless of the reason, the Activity Director *shall* notify the Title III Office in writing of an employee's termination and future plans for the position. The Activity Director *may not* hire a new employee using Title III funds until **all** owed vacation time and agreed upon severance pay has expired for the terminated employee. The College President, in conjunction with the Title III Director, *must approve* any severance package. When severance pay is granted, it is recommended that any Title III funds be paid as a lump sum.

#### **NEW EMPLOYEES**

**Whenever a new Title III employee is selected to fill a vacancy, the Title III Office is to be notified by the Activity Director. The Title III salary amount and position title *should* be verified with the Title III Office before the candidate is actually employed.**

After *approval* by the College President, a copy of the "***Recommendation for Hire***" form should be sent immediately to the Title III office along with a copy of the vitae (faculty), resume (professional), or employment application (administrative assistant, secretary, clerk, etc.).

#### **STUDENT EMPLOYMENT**

*Student employment under Title III-funded Activities is an appropriate and beneficial use of resources.* It is expected that student work assignments *will* be directly linked to an *approved* Title III Activity and that these assignments *will* be value-added experiences for the students. Activity Directors are expected to budget and closely monitor the expenditure of student wages. This *should* include ensuring that funds are available and adhere to **all** U.S. Department of Education and College regulations regarding student employment.

The Title III student employment process *requires* coordination with the Title III Office, Office of Human Resources, and Payroll. The decision to employ a particular student worker under Title III Programs rests solely with the Activity Director and the Title III Director. The following conditions apply to **all** Title III student workers:

**Student workers normally work during regular College operating hours unless otherwise approved by the Title III Director and Philander Smith College.**

**STUDENT WORKERS WILL NOT BE PAID FOR WORKING ON OFFICIAL COLLEGE HOLIDAYS. IN NO CASE SHOULD A STUDENT BE PAID FOR HOURS, NOT ACTUALLY WORKED.**

- Student work assignments *must* be tied to the specific funded Activity or the day-to-day operation of the unit directly supporting the Activity;
- Students *may* work up to twenty (20) hours per week;
- Students *must* be enrolled as **full-time students** during the Fall and Spring semesters and enrolled for at least 3 credit hours during the Summer term; and
- Students *may* not under any circumstance work in more than one Title III-funded position concurrently.**

#### **EMPLOYMENT OF NON-CITIZEN STUDENTS**

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

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

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

#### **PROCESSING STUDENT EMPLOYMENT REQUESTS**

The following procedures *must* be carried out *prior* to hiring student employees to be paid with Title III funds:

- Job descriptions are to be developed and posted. Notice of job opportunities *should* be displayed in areas frequented by students. **All** students *may* apply for these positions;
  - A current job description for each position *must* be submitted to the Title III Office and kept on file in the Activity Director's office;
  - Information on available student employment opportunities *must* be sent to the Title III Office. This information *will* be included in the *Activity's* file, and *will* assist the Title III Office in responding to inquiries regarding employment opportunities; and
  - Before a student can begin working, **and** in order for student wage requests to be processed in a timely manner, the Activity Director *must* ensure that **all** of the following forms are completed:
    - ✓ Philander Smith College Application\*
    - ✓ Form W-4\*
    - ✓ Employee Withholding Certificate\*
    - ✓ Form I-9 (U.S. Department of Justice)\*
    - ✓ Picture ID and a copy of Social Security Card
- \*These forms can be obtained from the Human Resources Department*

## STUDENT TIME AND EFFORT DOCUMENTATION (TIME SHEET)

In order for a student to receive payment through the Title III Program, a completed *Time and Effort Document* must be submitted to the Title III Office with the student and supervisor's signature. Failure to submit *Time and Effort Documentation* by the due date may result in a delay in a student being paid. Students and supervisors should adhere to the pay schedule issued by the Human Resources Office each semester.

### TIME AND EFFORT DOCUMENTATION

The U.S. Department of Education requires the College to document and maintain *Time and Effort Certification* on all federally supported employees (full-time and part-time). Each Title III-funded employee is required to complete a *Time and Effort form* indicating his/her activities during the reporting period. The documentation must be submitted within one (1) week after each pay period. There are two (2) pay periods each month as follows:

<b>1<sup>st</sup> PAY PERIOD – (1<sup>st</sup> through the 15<sup>th</sup>)</b>
<b>2<sup>nd</sup> PAY PERIOD – (16<sup>th</sup> through the last day of the month)</b>

Full-time, 12-month persons should submit *Time and Effort Documentation* for the 12-month period. Full-time, 9-month, and part-time faculty must submit *Time and Effort Documentation* from the date the work assignment begins to May 31 or until employment ends, whichever comes first.

Title III employees must complete the date and times in-and-out for each day in *Section A* of the *form* for each weekday (Monday through Friday). Meal times are excluded. Indicate how many hours are worked each day in the “*Federal Hours*” section.

In the “*Leave Hours*” section, indicate the number of hours taken for “*Annual*” (vacation) or “*Sick*” leave (for full-time staff the usual workday is 7.5 hours.) Indicate the hours taken for holidays or professional development travel in the “*Other*” section, for each day away from work (Monday through Friday).

Be sure to list in the “*Total Hours*” section for each day, the total number of hours worked or used for “*leave time*.” If hours are listed in the “*Other*” portion, be sure to indicate the reason in the “*Comments*” section.

In “*Totals*” at the bottom of the time sheet, compute the total number of hours for each category. The last column of the “*Totals*” section in the hours across and the last line under the “*Total Hours*” down should match.

**When an employee’s salary is divided among a federal grant, teaching, administration, or other responsibilities, there must be a clear accounting of all (100%) of the person’s time.** This information should be documented in *Section “B.”* Please indicate the title, *Activity* number, and percentage of effort expended for each *Activity* you were engaged, during the pay period. This information provides documentation for salary payment and time donated to each *Activity*. **Total effort must equal 100%.**

In *section “C”* (*Detail of Title III Work Performed*), please delineate concisely the *Activities* in which you were engaged and/or work performed during the pay period.

Each time sheet should be signed and dated by the employee and her/his supervisor or Activity Director.

For more information about the College's personnel policies, faculty and staff *should* consult their respective employee handbook.

***Purchase Requisitions*** will **not** be processed if the ***Time and Effort Report*** is **not** submitted by the deadline.

### **OVERTIME POLICY**

Title III funds for salaries are set when the budget is *approved* by the U. S. Department of Education. Additional funds are **not** available to pay overtime for Title III employees. In lieu of overtime pay, Title III employees who are entitled to receive overtime pay under *Federal* or State laws or Philander Smith College policies *should* receive compensatory time. The compensatory time *should* be taken within thirty (30) days of being earned.

The overtime policy *must* be consistent with any Philander Smith College policy related to "Compensation for Overtime." For more information, please refer to the Staff Personnel Policy Handbook.

### **PART-TIME EMPLOYEES**

Part-time employees working under the Title III Program are employed **without** fringe benefits, except for FICA, workmen's compensation, and unemployment insurance as required by Federal and State laws.

### **FACULTY OVERLOAD**

If a Title III faculty member teaches more than the prescribed number of hours at the College, any additional courses taught *must* be paid for by Philander Smith College. Title III funds for salaries are set when the budget is *approved* by the U. S. Department of Education. Title III funds are **not** available to pay additional salary for "course overload" of Title III faculty.

### **REDUCTION IN TEACHING LOAD**

Full-time nine-month faculty members are paid for twelve (12) teaching hours under the Title III Program. If a faculty member reduces the number of hours being taught, a change in that faculty member's status occurs. In consultation with the division chairperson and the Vice President for Academic Affairs, the faculty member *will* be re-assigned to part-time or adjunct status with a commensurate reduction in salary\*.

\*See **Faculty Handbook** for additional information.

### **INDEPENDENT CONSULTANTS**

Consultants *may* be engaged to assist in *Activities* only as described in the *Activity budget* and with *prior approval* from the U.S. Department of Education. Consultants are normally used either as workshop presenters or as experts who provide advice and/or a service.

When securing a consultant, the same procedures *must* be followed as established by the College. Title III regulations require that **all** consultants be documented as appropriate to the goals of the *Activities* and the availability of pre-approved grant funds. **Activity directors may not hire independent consultants to perform tasks included in the *approved* Title III work program unless:**

- (a) There is a *need* in the project for the services of that consultant.
- (b) The need **cannot** be met by using an employee rather than a consultant.
- (c) There is a *need* in the project for the services of that consultant.

**THE FOLLOWING RULES AND REGULATIONS APPLY WHEN HIRING CONSULTANTS:**

1. The responsibility for contracting the services of a consultant *shall* rest primarily with the Activity Director of the concerned *Activity* in consultation with the Title III Director and/or the Vice President for Fiscal Affairs, and/or the President of Philander Smith College.
2. The maximum allowance for a consultant fee and expenses is negotiable and dependent on available funds, but *shall not* exceed **\$1,000 per day**. All consultant costs *must* be in the **initial budget proposal approved** by the U. S. Department of Education.
3. After all the decisions are made related to the consultant and at least three (3) weeks in advance, complete the “*Consulting Request Form*” (obtained from the Title III Office) and return to the Title III Office.
4. In addition to the “*Consulting Request Form*” a “*PSC Authorization Request for Travel Expense*” form *shall* be completed for the travel expenses of the consultant (if expenses are to be paid in advance). Upon completion of travel, the *Travel Expenses Reimbursement form* **must** be completed and *should* include **all** receipts (airline, ground travel, hotel, meals, etc.).
5. To be paid, the consultant *must* complete the *Consultant Fee Request Form* (obtained from and returned to the Title III Office), *Form W-9*, and “*Request for Taxpayer Identification Number and Certification*” (obtained from and returned to the Human Resources Office).
6. If the service provided was in the form of advice, the *scope* of this *should* be carefully documented with a written report from the consultant indicating his/her findings and attached to the *Consultant’s Statement of Work Form*. When a consultant is engaged to provide on-campus training (workshops, seminars, etc.), documentation of this effort in the form of a program outline and evaluation of the program by participants *must* be attached to the *Consultant’s Statement of Work Form*.
7. Philander Smith College *may not* use Title III funds to pay a consultant’s fee to one of its employees, except **in extreme unusual circumstances and when the consultation involves a separate or remote operation** (special permission *would* be required from the U. S. Department of Education).
8. After all the decisions are made related to the consultant, and at least three weeks in advance, complete the “*Consulting Request Form*” and return to the Title III Office.
9. In addition to the *Consulting Request Form* a Philander Smith College *Travel Authorization Form* (Advance Request) *shall* be completed for the travel expenses of the consultant (if expenses are to be paid in advance). Upon completion of travel, the “*Travel Authorization Form*” (actual) *must* be completed and submitted, and *should* include **all** receipts (airline, ground travel, hotel, meals, etc.).
10. To be paid, the consultant *must* complete the *Consultant Fee Request Form* (obtained from, and returned to the Title III Office), *Form W-9*, and *Request for Taxpayer Identification Number and Certification* (obtained from, and returned to the Human Resources Office).

### TITLE III TRAVEL

Title III *regulations* require that **all** off-site conferences, workshops and travel be documented as appropriate to the Title III objectives or Philander Smith College's goals. **Therefore, BEFORE you attend off-campus programs, you must complete the "Title III Travel Request Form" and the Philander Smith College "Travel Authorization Form" and submit them to the Title III Office three (3) weeks prior to the event.**

#### **BUSINESS TRAVEL POLICIES, ADVANCES AND REIMBURSEMENT:**

**All necessary and reasonable** expenses for authorized College travel *will* be paid or reimbursed in accordance with the following guidelines.

**All travel supported by Title III funds will depend on the availability of funds and must comply with the following:**

1. Information *must* be completed in full on the two (2) official forms – with the required signatures:
  - a. Philander Smith College "Travel Authorization Form"
  - b. Title III "Travel Request Form"
2. Travel *will* be from Little Rock, Arkansas, to destination, and return. A **Purchase Order** *may* be required.
3. Legitimate registration fees *will* be paid as requested. It is expected that these fees *will* be paid early enough to allow for any discounts that *may* be available. A receipt *must* be submitted when submitting the *Actual Expense form* upon return.
4. Airfare *must* be booked at lowest possible fare at least three (3) weeks in advance. Bus and railroad fares *should* be at the tourist class fare. A *Purchase Order* *may* be required.
5. A standard rate of **\$.50 per mile** *will* apply for **all** automobile travel. However, the total cost should **not** exceed the lowest possible airfare to the city of travel.
6. If more than one Title III person is traveling within the same vehicle, only one reimbursement for vehicle travel *will* be made.
7. A standard *per diem* rate of **\$40.00 per day for meals** and other incidentals *will* apply (including costs for receptions, banquets, private dinners, etc.). If meals exceed the total amount allowed, receipts for **all** meals during the trip *must* be submitted for reimbursement to be calculated.
8. Actual hotel or other housing expenses *will* be paid (including taxes) provided this is the *reasonable* expected hotel cost of the conference/workshop/meeting reflected on the promotional materials or letter related to it. In the event other housing is chosen, it is expected that this housing cost *will not* exceed the cost of the main hotel.
9. *Prior* arrangements *should* be made for the purchase of educational books or literature since these items **cannot** to be purchased with travel funds.
10. Personal telephone calls (long distance and local) made by faculty or staff while traveling are *non-refundable* by the Title III Program.

11. Receipts for travel (registration fees, airline, hotel, taxi and limo (ground travel), parking, etc.) *should* be submitted to the Title III Office within five (5) days after returning to work, along with the completed “***Travel Authorization Form***” (actual).
12. If there are excess funds to be reimbursed to the College, a check payable to Philander Smith College *should* be submitted along with the “***Travel Authorization Form***” (actual) to the Title III Office. If funds are returned in cash (**not recommended**), the cash *should* be returned to the Business Office and a receipt requested and submitted to the Title III Office.
13. A written report of the conference/workshop/meeting *must* be submitted to the Title III Office **within seven (7) days after returning to work**. The report *should* include the information requested at the end of the Title III ***Travel Request form***.
14. Failure to submit the “***Travel Authorization Form***” (actual) **and** the *written report* in a **timely manner will jeopardize future travel under the Title III Program**.
15. Individuals wishing to attend a conference/workshop/meeting for more than one week *should* be prepared to share part of the cost.
16. If the ***Travel Request forms*** are **not** received in the Title III Office three (3) weeks before travel, it *may not* be possible to secure expense funds beforehand. Therefore, the individual *should* be prepared to pay for the trip and obtain reimbursement upon return.
17. **All** requests for Travel *must* be made “before” the travel and **not** “after” the travel. It is up to the individual requesting travel to make sure that **all** forms are submitted in a timely manner to the Title III Office. The person requesting travel *should not* depend upon supervisors or other persons to submit *Travel Requests*.

#### **NON-REIMBURSABLE TRAVEL COSTS:**

- Alcoholic beverage costs are **not** reimbursable.
- Entertainment costs are **not** reimbursable.
- Flight Insurance costs are **not** reimbursable.
- Foreign travel is **not** allowed without *prior approval* from the U. S. Department of Education. (This is very difficult to obtain.)
- Student travel is **not** allowed under the Title III Program.
- Travel for the recruitment of students is **not** allowed under the Title III Program.
- Rental car use is **not** reimbursable unless approved in advance by the Title III Office.
- Unreasonable costs (e.g., very expensive restaurants or exclusive hotels) and travel expenses incurred by a companion **cannot** be paid by the College and are **not** reimbursable.

#### **USE OF PRIVATE VEHICLE**

The use of private vehicles *must* be consistent with the Philander Smith College policy.

Personnel *will* be reimbursed at the rate of **fifty cents (\$.50) per mile** or air coach rate, whichever is less, for use of private vehicles when personnel are traveling on *approved*, official Philander Smith College business. Reimbursement for expenses incurred *may* be made for necessary travel to conduct college business, plus ***reasonable and prudent travel necessary*** to obtain meals.

If more than one Philander Smith College faculty/staff members are traveling within the same vehicle, only one reimbursement for vehicle travel *will* be made. It is recommended, when more than one person will be traveling to the same destination, that they travel in only one vehicle.

Common carrier or public transportation costs are **not** reimbursable on a trip when reimbursement is authorized for a private vehicle, unless it is shown that such transportation was more economical in a particular situation.

When using a personal vehicle, a Philander Smith College “***Travel Authorization Form***” must be completed.

Reimbursement of costs incurred through the use of a private vehicle *should* be for direct mileage, parking, and tolls between points on the personnel’s itinerary.

### **USE OF RENTAL CAR**

**Rental car use is discouraged.** However, if use of a rental car is a necessity, its use *must* be consistent with Philander Smith College’s policy regarding travel.

Special permission *must* be obtained from the Title III Office *before* the vehicle is rented. Charges *will* be reimbursed when required for intercity travel when alternate modes of transportation are **not** practical or available. **No** reimbursement *may* be made for use of a rental car in-state when a Philander Smith College vehicle or private car is available.

**Note:** The mileage rate for reimbursement of personal automobile use is a full-cost rate and assumes that the employee carries his or her own automobile insurance.

Reimbursement is provided for such items as customary gratuities, parking, business telephone calls (**no personal calls**), special fees for foreign travel, and costs of obtaining passports. If such expenses *exceed* **\$25.00**, they *must* be supported by *receipts*.

**Travel Insurance Notes:** The College carries insurance coverage for employees of the College against accidental death during travel on College business. Details of the coverage amounts and limitation are available from the Business Office.

### **PUBLICATIONS AND COPYRIGHTS**

**All** publications or presentations resulting from or primarily related to federal financial assistance *should* contain an acknowledgment indicating that the *Activity* was supported, in whole or in part, by the U. S. Department of Education. This statement should read as follows:

*“The contents of this (insert type of publication: e.g., book, report, workshop, film, brochure, video, newsletter, etc.) were developed under a grant from the U. S. Department of Education. However, those contents do not necessarily represent the policy of the U.S. Department of Education, and you should not assume endorsement by the Federal Government.”*

A grantee may copyright project materials in accordance with 34 CFR, part 74 or 80, as appropriate. “Project material” means a copyrightable work developed with funds from a grant of the U. S. Department of Education.

## TECHNICAL ASSISTANCE AND/OR FURTHER QUESTIONS

If you are in need of technical assistance or have further questions, please contact the Title III Office.

Alvin Anglin

or

Chris Watson

(501) 370-5316

[ubalvin@philander.edu](mailto:ubalvin@philander.edu)) or [cfwatson@philander.edu](mailto:cfwatson@philander.edu)

### Other Resources and Links:

- ✓ U.S. Department of Education Website: [www.ed.gov](http://www.ed.gov)
- ✓ Edgar Link: [www.ed.gov/print/policy/fund/reg/edgarReg/edgar.html](http://www.ed.gov/print/policy/fund/reg/edgarReg/edgar.html)
- ✓ Title III - Part B, Strengthening HBCU Programs:  
<http://www2.ed.gov/programs/iduestitle3b/index.html>
- ✓ Federal Register: [www.gpoaccess.gov](http://www.gpoaccess.gov)
- ✓ Grants Management Circulars: [http://www.whitehouse.gov/omb/grant\\_circulars](http://www.whitehouse.gov/omb/grant_circulars)
- ✓ Office of Postsecondary Education:  
<http://www2.ed.gov/about/offices/list/ope/dues/index.html>
- ✓ National Association of Historically Black Colleges and Universities Title III Administrators:  
<http://www.hbcut3a.org/Index.aspx>

## **NOTES**