Acceptance of Award Policy,
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PURPOSE

This policy outlines Northern Virginia Community College's (NOVA, or the College) principles and guidelines toward the acceptance and preparation of sponsored programs after a Notice of Award has been received by the College. It includes specific criteria and useful tools that must be utilized by program participants to ensure that the College remains compliant with applicable regulations in fulfillment of the award.

Failure to follow the practices detailed in this policy could lead to inappropriate acceptance and the inability to perform the College's sponsored program responsibilities, resulting in termination or misuse of funding, damage to the College’s reputation, and/or noncompliance with organizational and governmental regulations.

APPLICABILITY

This policy applies to programs related to the following sources of funds:

- Federal funds
- State funds
- Local funds
- Private funds
- Association funding

KEY ROLES AND RESPONSIBILITIES

Executive Vice President, Academic & Student Services

The Executive Vice President, Academic & Student Services is responsible for functional oversight of the College’s sponsored programs. In this capacity, the Executive Vice President, Academic & Student Services must verify that appropriate personnel, resources, and frameworks are in place to support the life cycle of each NOVA program while allowing for sustained growth.

Executive Director of Office of Grants of Development

The Executive Director of Grants of Development is responsible for programmatic oversight of the College's sponsored programs. By monitoring and enforcing compliance regulations, maintaining working relationships with NOVA employees and external funding agencies, and providing experienced direction toward program development, the Executive Director of Grants of Development is responsible for daily management of the College's ongoing programs as well as forthcoming opportunities for growth.

Assistant Director of Grants of Development / Grant Writers

The Assistant Director of Office of Grants Development and Grants Writers provide support roles in the identification, development, and execution of sponsored programs. They are responsible for assisting College employees in obtaining a sponsored program and providing knowledgeable information when necessary. Duties include identifying opportunities, assisting in preparation of the proposal, and providing programmatic and compliance oversight throughout the life cycle of the award.

Principal Investigator / Project Director

The Principal Investigator / Project Director (PI/PD) is responsible for executing, managing, and monitoring the financial and programmatic activity related to a sponsored program.
POLICY OVERVIEW

Award Review, Revisions, and Acceptance

Upon official notification of an award, applicable personnel in the Office of Grants of Development and the PI/PD must review the award to verify that the terms and conditions agree with the information recorded in the pre-award documentation, including the funding agency’s program announcement and the College’s submitted proposal. If there are discrepancies, or any unexpected restrictions or obligations that are inconsistent with the College’s expectations of the program and/or existing NOVA policies and procedures, the funding agency must be contacted immediately to resolve the issue(s).

Any material revisions to a program – including limitation or expansion of funding and/or substantive changes to the scope, period, personnel, or deliverables of the program – must be reviewed and approved in accordance with the original proposal guidelines outlined in the Grants of Development: Pre-Award Policy.

To accept a program award on behalf of the College, an authorized representative of the Office of Grants of Development, and the President and/or Vice President, Finance if required by the terms of the award, must sign all required documentation provided by the funding agency. The signed document(s) must be provided to the funding agency using the specified method of delivery within the timeframe stated in the award. An electronic file must be created for each program, with copies of all award documentation retained in the file in accordance with the ‘Record Retention’ section of this policy.

Program Coordination

Upon acceptance of an award, applicable information must be communicated to stakeholders so that preparation for the program may begin as soon as possible. Regardless of the size and duration of the award, a uniform review process must be enacted to allow for consistency and proper verification of all program requirements. To the extent possible, personnel in the Office of Grants of Development shall institute a kickoff meeting with related parties immediately after acceptance of the award. It is at the discretion of the Office of Grants of Development to determine who must participate in the meeting, but select employees from various Offices / Departments must be included to verify proper understanding of individuals’ roles and responsibilities related to the following components:

- Program budgets
- Financial / programmatic reporting requirements
- Compliance
- Hiring needs
- Purchasing terms, preferred vendors, etc.
- Technology requirements (including system access)

Agendas for the meeting, including a participant list, must be documented and retained in accordance with the ‘Record Retention’ section of this policy. In addition, each individual’s agreed-upon responsibilities must be documented and signed by the individual as proof of acknowledgement. In the event that responsibilities are dedicated to an entire function, e.g. hiring performed by the Human Resources Department, the participating individual must sign on behalf of all employees involved in the process. If it is unfeasible or unreasonable to
hold a kickoff meeting for a given program, roles and responsibilities still must be documented and communicated to each individual, and proof of acknowledgement is still required.

Prior to the period of performance, appropriate personnel must consider the following tools/processes to support execution of the program. Implementation may vary on a case-by-case basis, but employment of these techniques is strongly encouraged and paramount to maintaining compliance with award requirements and applicable regulations.

**Tracking / Reporting**

After initial briefing and verification of roles, a summary sheet of the award must be prepared if deemed appropriate based on the complexity, dollar value, and length of the award. The tool may be used to highlight key information – such as deadlines, performance measurements, individual responsibilities, financial / programmatic requirements (including approval authority), etc. – that may be referenced by all stakeholders throughout the life cycle of the program. Application of such a document reinforces major compliance requirements and decreases the potential for duplicative / unnecessary efforts.

To assist ongoing financial and programmatic performance of the award, the College must initiate consistent methodologies for monitoring program activity and adhering to the terms and conditions of the award. While individual reporting requirements vary by program, a routing form shall be required to establish a uniform review structure that tracks proper levels of approval to confirm compliance and verify data accuracy. Standardized tracking tools must be developed by P/I/PD, Office of Grants Development and Office of Budget, specifically around data that is not readily available in the College's accounting system. This includes cost sharing, when NOVA or another entity is obligated by terms of the award to contribute resources to the program through in-kind contributions or matching funds.

**Performance Evaluation**

Before initiation of an awarded program, applicable personnel in the Office of Grants of Development must develop measurable evaluation criteria to determine the level of efficiency and effectiveness the program has achieved during and after its execution. The performance evaluation plan should identify specific goals and objectives that have been established and agreed upon by NOVA and the funding agency. Completion of each criterion shall be monitored throughout the life cycle of the program to measure performance against expectations. As issues are identified, associated remediation plans must be instituted to link program results with stated goals and objectives.

**Personnel Needs**

If the terms of an award require the hiring of a full or part-time employee, personnel in the Office of Grants of Development must coordinate with the appropriate officials and the Human Resources Department to post, recruit, and hire for the position in accordance with NOVA and VCCS policy as well as other regulatory requirements. At the time of hiring, any conditions of the individual’s employment must be clearly communicated and documented. If the position is restricted to performance of the sponsored program, the Human Resources Department must be made aware so that separation of the individual can occur in concert with completion of the contract immediately after the program has closed out.

The names and key information of all personnel that are partially or fully paid by
or working on the program, including existing NOVA employees, must be provided to the Human Resources Department via a Personnel Action Request (Form 105-094) in a timely manner prior to execution of the award. If an employee is not fully dedicated, the form must identify the applicable percentage of time chargeable to the program so that account coding may be split in the College’s payroll system between the sponsored program and the complementary division/department.

It is the responsibility of the Office of Grants of Development to communicate when each employee’s duties related to the program are complete so that no additional payroll expenses are charged to the program.

Travel Requirements

If travel is required, and budgeted, as part of a program, personnel in the Office of Grants of Development must communicate pre-travel requirements to each employee to avoid potential delays. For all travel, including arrangements funded by a sponsored program, the College follows guidelines specified in the Commonwealth Accounting Policies and Procedures (CAPP) manual topic 20335 – State Travel Regulations and procures goods/services in accordance with the Code of Virginia’s Virginia Public Procurement Act (VPPA), the Agency Procurement and Surplus Property Manual (APSPM), NOVA procurement guidelines, and other federal and state laws and regulations.

Adherence to these conditions requires employees to use the most cost effective alternative when making automobile, bus, air, and rail travel arrangements, and includes specific lodging requirements. Additional Commonwealth of Virginia restrictions may apply regarding the use of travel agents when purchasing airline tickets. Further, if international air travel is required by the terms and/or conditions of a federal program, a U.S. flag air carrier must be used in accordance with Subpart 47.4 of the Federal Acquisition Regulations – Air Transportation by U.S.-Flag Carriers.

Each employee must take specific actions to comply with these regulations – and also prepare a Travel Request (Form 105-002) through Chrome River complete with proper approvals – so program employees should be encouraged to make their travel arrangements as soon as possible.

Subrecipients

Through acceptance of an awarded program, the College initiates its agreement with a subrecipient to perform specific duties under the award. To minimize financial, programmatic, and compliance concerns, appropriate program personnel shall establish specific guidelines for the subrecipient that may be tracked, monitored, and documented once the program is executed. Creation of this tool shall be standardized to address basic requirements that are inherent in any subrecipient agreement, including timely and accurate submission of programmatic deliverables and financial invoices, and compliance with all audit requirements and OMB Uniform Guidance Subpart F audit findings.

If use of a subrecipient is required after acceptance of an award, and was not included in the original proposal, appropriate personnel must follow guidelines outlined in the Grants of Development: Pre Award Policy for determination, selection, and acceptance of the entity as subrecipient, so long as the College maintains compliance with the terms and conditions of the original award. Generally, the use of subrecipients to conduct programmatic activities that were not requested and approved in the original application by the sponsor requires prior approval by the sponsoring agency before undertaking any new contract.
Policy Deviations

It is recognized that on rare occasions there may be a need to deviate from this policy. In the event this situation occurs, the reason for deviation must be clearly documented subject to the approval of the Executive Vice President, Academic & Student Services and retained in the official record of the sponsored program.

Record Retention

In accordance with CAPP manual topic 20605 – Federal Grants Management, records related to fiscal activity and other supporting documentation must be retained for a period of at least three years. NOVA shall adopt the same requirements for all funding sources and all elements of the program, including award acceptance and internal support records. The retention period generally starts at the close of the fiscal year covered by the award or at the time of final close-out, but may begin on a date unique to the award (e.g. from the date of submission of the final expenditure report or, for awards that are renewed quarterly or annually, from the date of the submission of the quarterly or annual financial report).

For pending, ongoing, or unresolved litigation, audits, or claims, documentation must be retained until completion, resolution, or negotiation of settlements in accordance with standard schedules. Destruction of records must be in accordance with policies and procedures of the Records Analysis Section of the Library of Virginia.

DEFINITIONS

- Cost sharing – The process in which program costs, goods, or services are shared among entities. Cost sharing can take the form of matching funds, leveraged resources, or in-kind contributions.

- Notice of Award – Legal document issued by a funding agency to notify the recipient that an award, based on a submitted proposal, has been made and funds are available

- Subrecipient – An entity that receives a sub-award from a primary recipient; by assuming responsibility for programmatic decision making and adherence to applicable compliance requirements, the subrecipient is held accountable for the use of all funds provided by the sub-award

POLICY REVIEW

This policy must be reviewed annually, commencing on the first anniversary of the policy’s effective date.
OTHER/REFERENCES

Circular: Educational and Non-Profit Institutions Documents:
- OMB Uniform Guidance, Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards

Federal Acquisition Regulations:
- Subpart 47.4 – Air Transportation by U.S.-Flag Carriers

Code of Virginia
- Title 2.2 Chapter 43, Virginia Public Procurement Act

Virginia Department of General Services’ Division of Purchases and Supply:
- Agency Procurement and Surplus Property Manual

VCCS Policy Manual:
- Section 4 – Administration and Finance
- Section 11 – Sponsored Programs

Commonwealth Accounting Policies and Procedures Manual, sections:
- 20335 – State Travel Regulations
- 20605 – Federal Grants Management

Library of Virginia:
- Records Analysis Section

Relevant NOVA Forms:
- Personnel Action Request (Form 105-094)
- Travel Request (Form 105-002)

Relevant NOVA Policies and Procedures:
- Grants of Development: Pre-Award Policy and Procedures
- Grants – Financial Policy and Procedures (Post-Award)