Sponsored Programs:
Acceptance of Award Policy, v. 1.0
### Sponsored Programs: Acceptance of Award Policy

<table>
<thead>
<tr>
<th>Version Number:</th>
<th>1.0</th>
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<tbody>
<tr>
<td>Policy Identifier:</td>
<td>OSP-P0002</td>
</tr>
<tr>
<td>Superseded Policy(ies):</td>
<td>N/A</td>
</tr>
<tr>
<td>Date Approved:</td>
<td>November 21, 2013</td>
</tr>
<tr>
<td>Effective Date:</td>
<td>December 01, 2013</td>
</tr>
<tr>
<td>Policy Author(s):</td>
<td>Office of Sponsored Programs Staff</td>
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<tr>
<td>Policy Owner:</td>
<td>Executive Director of Sponsored Programs</td>
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<tr>
<td>Policy Approver:</td>
<td>Executive Vice President, Academic &amp; Student Services</td>
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<tr>
<td>Policy Repository:</td>
<td>Office of Sponsored Programs’ Policies and Procedures Repository</td>
</tr>
<tr>
<td>Supporting Documentation:</td>
<td>See Other/ References Section</td>
</tr>
<tr>
<td>Retirement (Renewal) Date:</td>
<td>December 31, 2014</td>
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PURPOSE

This policy outlines Northern Virginia Community College's (NVCC, 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 NVCC program while allowing for sustained growth.

Executive Director of Sponsored Programs

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

Office of Sponsored Programs Staff and Grant Writers

The Office of Sponsored Programs staff and Grants Writers provide support roles in the identification, development, and execution of sponsored programs. After acceptance of an award, they are responsible for providing necessary information and assisting preparation of monitoring / tracking tools used by program participants to execute 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 Sponsored Programs 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 NVCC 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 Sponsored Programs: Pre-Award Policy.

To accept a program award on behalf of the College, an authorized representative of the Office of Sponsored Programs, 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. Personnel in the Office of Sponsored Programs shall institute a kickoff meeting with related parties immediately after acceptance of the award. It is at the discretion of the Office of Sponsored Programs 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 evidence 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 evidence of acknowledgement is shall be maintained in the official file.

Program Support

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 also be incorporated, specifically around data that is not readily available in the College’s accounting system. This includes cost sharing, when NVCC or another entity is obligated by terms of the award to contribute resources to the program through in-kind contributions or matching funds. Such disbursements are not recorded to the account coding set up for the award, so it is the responsibility of applicable personnel in the Office of Sponsored Programs and the PI/PD to track and account for these expenses of the College.

Performance Evaluation

Before initiation of an awarded program, applicable personnel in the Office of Sponsored Programs 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 NVCC 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 Sponsored Programs should coordinate with the Human Resources Department to post, recruit, and hire for the position in accordance with NVCC 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 NVCC 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 Sponsored Programs 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 Sponsored Programs 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), NVCC 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) complete with proper approvals – so program employees should be encouraged to make their travel arrangements as soon as possible.

**Sub-recipients**

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 circular A-133 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 Sponsored Programs: 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. NVCC 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

Circulars: Educational and Non-Profit Institutions Documents:

- OMB Circular A-21 – Cost Principles for Educational Institutions (relocated to 2 CFR, Part 220)
- OMB Circular A-102 – Grants and Cooperative Agreements With State and Local Governments
- **OMB Circular A-110** – Uniform Administrative Requirements for Grants and Agreements With Institutions of Higher Education, Hospitals, and Other Non-Profit Organizations (relocated to 2 CFR, Part 215)

- **OMB Circular A-133** – Audits of States, Local Governments, and Non-Profit Organizations

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 NVCC Forms:

- **Personnel Action Request (Form 105-094)**
- **Travel Request (Form 105-002)**

Relevant NVCC Policies and Procedures:

- Sponsored Programs: Pre-Award Policy and Procedures
- Grants – Financial Policy and Procedures (Post-Award)