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100.00 THE BUSINESS OFFICE

The Business Office supports the effort of the Principal Investigators (PI) and administrators in managing funds awarded as grants and contracts, as well as other sponsored projects. The office

- maintains project files and records,
- prepares and submits financial reports and invoices to extramural sponsors,
- pre-audits restricted costs,
- tracks equipment purchases,
- ensures compliance with College, State, Federal and Private sponsors' requirements,
- provides financial information,
- assists in audit and audit resolution,
- controls fund/account number assignment,
- enters proposal and grant information into computer system,
- monitors the monthly Project Financial Reports, and
- collects payment from sponsors to reimburse Great Falls College MSU for program expenditures.

Checks and balances. The following separation of duties will be followed to assure appropriate checks and balances in managing grant funds. The Controller will draw down grant funds; the Grants Accountant will maintain financial records, create spending reports and receive/track program income; the Project Manager will approve all spending requests; Accounts Payable will pay invoices.

The staff is also responsible for the accounting of the College's Facilities and Administration Cost return accounts, and for providing information about the Facilities and Administration Costs of sponsored projects.

200.00 PROPOSAL PREPARATION

Following are the basic steps to writing a successful proposal. Please keep in mind that the following is a general outline.

Obtain the proper forms.
Please be sure to obtain the proper application forms and the formatting specifications from the sponsoring agency.

Important items to check include:

- eligibility
- application deadline (postmarked or received)
- required format
- minimum and maximum number of proposal pages per section
- number of copies required
SUBJECT: Financial Affairs
Procedure: Grant Guidelines
Effective: July 2012 Revised: April 2016 Reviewed: April 2016

- submission procedures (most applications require electronic submission for which you must register; do this early in the process)
- number of years of support allowed by sponsor
- maximum budget allowed
- special budget forms
- table of contents requirements
- special assurance forms
- checklists
- required signatures (make sure signatories will be available to review and sign off on the finished proposal)
- appendix materials allowable (and format for)
- required matching/cost sharing/leveraged resources (in-kind) contributions and percentages
- facilities and administration costs allowed and percentages certification documents

A good proposal has, as its core, a good idea; it takes considerable time and effort to transform a good idea into a solid proposal. In general, a proposal will take the following format:

Cover Page or Cover Letter
Abstract
Project Narrative
Evaluation of the Available Resources
Bibliography
Budget and Budget Narrative
Appendices

In addition, you may wish to consider the following in your proposal preparation:

- Will any subcontracting occur? (Requisition and sole source forms may be required.)
- Does the proposal contain any entertainment expenses? (Specific permission is required from Federal sponsor.)
- Do the travel budget amounts agree with approved State of Montana rates?
- Is tuition shown as a separate line item?
- Will human subjects, animals or hazardous materials be utilized?
- Check to see if the project will require Institutional Review Board review
- Numerous articles are available on the web offering proposal writing assistance. Please go to: http://www.montana.edu/wwwvr/osp/propwrit.html

The next step is to organize and develop a draft. It is advisable to have colleagues critique the proposal and then have the appropriate comments and suggestions incorporated into the second draft. Prepare the final proposal.

*The Business Office must review your proposal at least 24-48 hours prior to your submission.*
300.00 BUDGET DEVELOPMENT

The cost elements of a budget must be those necessary to accomplish the proposed activity. Cost estimates of individual line items should be carefully calculated so that the requested funds are adequate, but not excessive. As you develop your budget, it is important to keep in mind that sponsored project costs fall into two broad categories: direct costs and facilities and administration costs. Because the definitions of "facilities and administration" versus "direct" costs vary at each institution, no blanket definitions of these types of costs exist.

A budget narrative should follow your itemized budget to fully identify and explain items or activities. For example, the need for the use of contracted services, use of subcontractors or other collaborating organizations, items of equipment having a unit cost of $5,000 or more, or the necessity for foreign travel should be highlighted in the budget narrative.

310.00 DIRECT COSTS

Generally speaking, direct costs are those which can be specifically identified and allocated to a single sponsored project. These costs usually include salaries/wages, fringe benefits, contracted services, supplies, equipment, travel, communication, awards (tuition remission) and participant support costs.

A. Salaries and Wages
   - **Faculty** - Use current salary figures adding a reasonable inflation factor (2-4%) up to a maximum of 10% per year if desired. **No extra compensation may be paid from a sponsored project unless it is specifically identified as such, requested from the agency in the proposal and approved**, example: for summer salary, the National Science Foundation will only pay 2/9 of the academic year salary
   - **Classified Staff** - Use current salary figures adding a reasonable factor for inflation. If the position is new, contact the College Payroll/Benefits Office to establish an approximate grade and salary
   - **Professional Staff** – use current salary figures, adding a reasonable factor for inflation. If the position is new, contact the College Payroll/Benefits Office to establish an approximate grade and salary

B. Fringe Benefits
   There are four different benefit rates for budgeting depending upon whether the employee is faculty, classified, professional, a full-time student, or temporary help. Contact the College Payroll/Benefits Office for rates.

C. Equipment
   Only items costing $5,000 or more, each with a useful life of more than 1 year should be listed here. Cost estimates should include any tax and shipping costs associated. Parts or pieces of equipment to be fabricated (totaling $5,000 or greater) should also be included in this category.
All grant purchased equipment must be tagged with unique asset number. This number will be used to identify the piece of equipment once it is logged and track in the current inventory system. Individual grants may have additional tagging requirements. GFC-MSU will comply with all such requirements.

**Restriction on General Purpose Office Equipment:** Please note that on Federal awards, the Office of Management and Budget does not allow purchase of general purpose office equipment. According to OMB Circular A-21, "'General purpose equipment' means equipment, the use of which is not limited only to research, medical, scientific or other technical activities. Examples of general purpose equipment include office equipment and furnishings (chairs, file cabinets, etc.), air conditioning equipment, reproduction and printing equipment, motor vehicles, and automatic data processing equipment." These are only allowable if they have been approved by the sponsoring agency in advance of purchase.

**D. Travel**
- Per diem and mileage rates are available through the Business Office.
- See if your sponsor requires separate categories for domestic and foreign travel.
- Always provide details for the business office to review as to how you arrived at your figures.
- Agencies are often asking for details when they review the proposal. Keep in mind that a lump sum travel figure with no destinations and/or detail may hold up your award process.
- Travel must follow State of Montana Travel Policy rules and rates.

**E. Materials and Supplies**
Project manager’s best estimate or catalog price, plus tax and shipping costs for each item. This includes all supplies used for the grant that are under $5000. Grant purchased supplies which may be considered a high theft liability will also be tagged with a Great Falls College MSU grant tracking number and logged in the inventory system (AiM).

**Restriction on General Purpose Office Equipment:** Please note that on Federal awards, the Office of Management and Budget does not allow purchase of general-purpose office equipment. According to OMB Circular A-21, "'General purpose equipment' means equipment, the use of which is not limited only to research, medical, scientific or other technical activities. Examples of general purpose equipment include office equipment and furnishings, air conditioning equipment, reproduction and printing equipment, motor vehicles, and automatic data processing equipment." These are only allowable if they have been approved by the sponsoring agency in advance of purchase. Great Falls College MSU’s current interpretation of this regulation is that this restriction applies to material/supply purchases of items such as chairs, file cabinets, workstations, printing equipment, etc., even though the purchase price of the item may not exceed Great Falls College MSU's $5,000 capitalization level.

**F. Publications**
Project Manager’s best estimate of page charges, etc.

**G. Consultant and Contracted Services**
SUBJECT: Financial Affairs  
Procedure: Grant Guidelines  
Effective: July 2012 Revised: April 2016 Reviewed: April 2016

This category consists of services rendered by others EXCEPT equipment rentals, repairs and maintenance. It includes consultant and professional services, honorariums/speaker fees and general off-campus and on-campus services.

Most federal agencies will limit the maximum daily compensation rate paid to off-campus consultant services.

H. Subcontracts
- Have each subcontractor prepare and submit a detailed budget and a scope of work.
- List each subcontract separately on your budget. Check math on budgets submitted by subcontractors.
- If the subcontractor is requesting facilities and administration costs (formerly known as "indirect costs"), include them as a direct cost to Great Falls College MSU under subcontract costs.
- Great Falls College MSU can collect F&As (Facilities & Administrative Costs, formerly known as "IDCs") on each subcontract for the first $25,000 of that contract for the life of the award.

I. Communication
This includes long distance telephone communication, postage, FedEx, advertising and associated costs.

J. Repairs and Maintenance
This includes costs of maintaining property (e.g., maintenance contracts for office equipment and repairs of that equipment) and repairs to vehicles.

K. Participant Support Costs
Participant support costs are direct costs for items such as stipends or subsistence allowances, travel allowances, and registration fees paid to or on behalf of grant participants, not including non-employee advisors or consultants. There are no facilities and administration costs charged on participant support costs on federal awards.

320.00 FACILITIES AND ADMINISTRATION COSTS (FORMERLY KNOWN AS INDIRECT COSTS)

Facilities and administration costs are those that are incurred for common or joint objectives and therefore cannot be identified readily and specifically with a particular sponsored project, an instructional activity, or any other institutional activity. Contact the Business Office for the current rate before assembling your proposal budget.

Because facilities and administration costs are specific kinds of costs, not all proposals will allow a request for facilities and administration cost reimbursement from the sponsor.

A. The full facilities and administration cost rate will generally be applied on all proposals unless the funding agency prohibits facilities and administration costs, or specifies a specific rate to be used.
B. Facilities and Administration Costs are charged on all costs with the exception of:

- Equipment items costing $5,000 or more for each item
- Costs over $25,000 on each subcontract
- Participant Support Costs
- Tuition Remission

330.00 F&A (FORMERLY KNOWN AS IDC) GUIDELINES AND USES

F&A costs are those that are incurred for common or joint objectives and therefore cannot be identified readily and specifically with a particular sponsored project, an instructional activity, or any other institutional activity.

340.00 COST SHARING

Cost sharing is the contribution to a sponsored project that supplements grant funding. In general, cost sharing and matching represent the portion of project costs not borne by the project sponsor.

There are generally two types of cost sharing; they are referred to as hard dollar and soft dollar.

Effective October 1, 2004 Great Falls College MSU’s cost sharing policy for federally funded projects will be the following:

Cost sharing can only be added to proposals if it is required by the sponsor (i.e. listed in the RFP) as one of the eligibility criteria to apply for the award.

Cash or hard dollar contributions

These represent the grant recipient's cash outlay, such as supplies purchased with state funds, and outlay of money contributed to the recipient by non-federal third parties to the project.

Soft dollar contributions

Examples of soft dollar cost sharing could be: “In-Kind Contributions”

These represent the value of non-cash contributions provided by the recipient and non-federal third parties. These may be the value of goods and services directly benefiting and specifically identifiable to the project.

Faculty release time, i.e., PI works on the project during a portion of the academic year, and does not charge the project his/her salary during this period, plus the payroll fringe benefits relating to the release time.

The value of waived or lowered facilities and administration costs on the federal portion of a federal project with the approval of the Federal Agency.
General guidelines for computing cost sharing or matching

- The recipient's records must document cost sharing.
- You cannot cost share federal funds from one federal project to another federal project unless you have written authorization from both federal agencies.
- Cost sharing charges are expenses that are necessary and reasonable to the project and that are allowable under university, state, and federal cost regulations (if your project is federally funded) and within the period of the grant award.

Project Manager must notify the Business Office of matching fund expenditures at the time of the expense.

If cost sharing obligations are not required, they should not be listed on the budget page and should not have a dollar value assigned in the narrative. Be sure you are not over-committing a person's time beyond 100% effort. As a general rule, cost share the minimum amount required.

400.00 SUBMITTING A PROPOSAL

Before a proposal may be forwarded to a sponsor, it must receive approval from the Business Office and the relevant Associate/Assistant Dean.

One copy of the proposal, with a final budget, budget justification must be submitted and approved, prior to submission to the sponsor.

Many sponsors require or allow at least a partial electronic submission. As with any proposal, please contact your fiscal manager when preparing a proposal. Online submission systems also require an Authorized Organizational Representative to review and approve proposals in progress. While E-proposals must conform to the instructions provided by the specific sponsor, campus approval is required prior to submission to any sponsor.

All proposals must be submitted through the Business Office for approval. Your proposal will be reviewed for compliance with various university, state and federal guidelines. The Business Office is also responsible for the accounting of the College's facilities and administration cost return accounts, and for providing faculty with information about the facilities and administration costs of sponsored projects.

Plan ahead and give yourself plenty of time. Be aware of what the application deadline is and whether it means postmarked or received by. Also note the time of day and time zone specified.

If a pre-proposal is required by the sponsor it must be submitted through the Business Office just like a regular proposal. It is important to have a record of the submitted proposal available when the sponsor calls.
600.00 AWARD ANNOUNCEMENT

Typically a funding agency will notify the Authorized Organizational Representative regarding its decision on a proposal. Please remember that the project manager and a Business Office representative handles contract negotiations. If you receive an award announcement or contract, send the original award document to the grants accountant in the Business Office immediately. Many award agreements need to be negotiated due to budget adjustments proposed by the sponsor. All awards must be processed through the Business Office before an award acceptance and subsequent account is opened through that office.

700.00 SETTING UP A NEW SPONSORED PROJECT ACCOUNT

Once the sponsor grants an award and the terms and conditions are accepted and approved by both the authorized representative for the College and the project manager, an index/fund number is assigned by the Business Office. This signifies that the account is housed within the area and is subject to restricted use. Once you have been notified of the index/fund number, you may charge allowable project expenses against the account in accordance with the project start date, end date and the approved budget.

800.00 PROJECT MANAGEMENT

The technical requirements and the day-to-day administration, as well as financial management, of the project are the responsibility of the project manager, under the supervision of the department head and dean.

WHO MAY SERVE AS A PROJECT MANAGER? Any Great Falls College MSU non-temporary, salaried, state classified, or general faculty employee may serve as a project manager.

810.00 RESPONSIBILITIES OF PROJECT MANAGER

In general, it is the responsibility of the project manager to read and become familiar with the agreement/contractual requirements of the project, and to:

- Follow internal policies and procedures as outlined in http://www.msugf.edu/about/PoliciesProcedures/index.php.
- Conduct the project according to the approved statement of work or the terms and special conditions published in the award agreement;
- Notify the Business Office of any proposed changes in the scope of the project, change or absence of project manager, changes in budget, period of performance, etc.;
- Supervise expenditures in conformity with the budget approved by the sponsor;
- Initiate the necessary documents/forms for travel, purchasing, employment, contracted services, extra compensation, etc., in conformity with established Great Falls College MSU business policies and procedures;
PROCEDURE

SUBJECT: Effective:

Training

Upon

DISCLAIMER: or

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Hard copy originals of all official grant documents, such as contracts, grant award notification, etc., will maintained in the Business Office by the grants accountant.

A copy of all time and effort reports that are grant related need to be submitted to the grants accountant.

Other hard copy documents will be maintained by the project manager.

Records containing sensitive student information will be kept in a secure location in accordance with FERPA regulations.

Records will be retained for a length of time as determined by the granting agency, state regulations and audit requirements.

820.00 HOW TO PAY BILLS AND CHARGE EXPENSES

If salaries are to be paid from the project, a time and effort report for the employee must be completed at the departmental level and forwarded to the grants accountant; the payroll officer needs to be advised of the percentage of salary and benefits to be paid from the project so the payroll system can be set up correctly.

Expenditures against a sponsored project account should be made in accordance to Montana University System and Montana State procurement policies [http://www2.montana.edu/policy/purchasing/](http://www2.montana.edu/policy/purchasing/) with the line item budget in mind. Proper back-up (such as original invoices) are required.

All grant related invoices and travel reimbursements must be approved by the project manager and the controller prior to payment. External payments are paid by Accounts Payable, and payments to other state agencies are made by the grants accountant. The controller draws down cash from the granting agency.

Certain charges within the College system may be automatically charged to the grant index (e.g., motor pool, computing services, library loan, telephone charges, etc.). However, it is still the responsibility of the project manager to ensure that these expenses are correct.

The Business Office will return to the project manager requests for travel reimbursement if the travel took place more than 90 days prior to the request. The State of Montana Operating Manual requires that we adhere to this policy. We cannot reimburse travel expenses when the travel took place more than 90 days prior to submission of a travel expense voucher.

All expenses must be incurred before the closing date of the sponsored project.

825.00 EQUIPMENT MANAGEMENT
Equipment will be maintained and managed in accordance with Montana University System and Montana State property management procedures (http://www2.montana.edu/policy/property/manual.html)

830.00 CLOSING AN INDEX

Closing of a grant account occurs when the Index is removed from active status to inactive status by Business Office personnel. This occurs after the work on the project has been completed (or the end date is reached), all the project accounting records are in order (the required technical, financial, patent and equipment reports have been submitted to the sponsor), and cost sharing commitments have been met and documented.

The federal government and many non-federal sponsors require that projects be closed within ninety (90) days of the termination date of an award. In fact, many sponsors refuse to issue new awards if existing awards are not properly closed. Expenditures and corrections submitted more than 90 days after project termination cannot be approved and will be returned to the submitting department.

Final Reports and Deliverables:
The Project Manager is responsible for ensuring that the final technical report and any other deliverables required under the contract documents are delivered to the sponsor within the allowable time frame.

Appropriate Types of Cost Transfers:
Federal regulations recognize three general circumstances under which cost transfers may be appropriate. In all cases, the transfers must be timely, within ninety days of the original transaction, and in all cases, expenditure correction forms are necessary:

- To correct clerical errors in the original charges;
- To reflect legitimate re-budgeting as a result of a change from the initial work plan; and
- To reallocate resources between accounts that support closely related work for reasons other than to cover an over expenditure or to spend out remaining funds. "Relatedness of sponsored projects" must have been established in advance with the sponsoring agency.

Federal guidelines also specify the type of written documentation required to justify these transfers. Appropriate transfers must be accompanied by a written explanation of:

- When and how the original charge occurred.
- Justification for the new charge.
- Back-up documentation.

(For budget revision, pre-award spending, and no-cost extension requests.)

In an effort to explore ways to reduce the number of post award administrative requirements concerning
changes from the approved application or budget, many federal agencies have delegated institutions receiving research grants to approve certain post award changes under the "expanded authorities" provision. In using this authority, grantees must ensure that they exercise proper stewardship over these funds and that all costs charged to the awards are allowable, allocable and reasonable.

**Budget Revision.** Whenever the project manager wishes to deviate from the original budget as awarded by the sponsor by more than 10% (may be more or less restrictive depending upon the sponsor), a revised budget must be sent to the sponsor.

**One Year, No-Cost Extension** to complete the work on a project. The project manager has this authority on some federal awards. Any such request must be made in writing to the sponsor in the time frame dictated by the sponsoring agency. If an extension is granted, the project manager should notify the Business Office upon notification from the sponsor.

### 840.00 PRE-AUDIT OF RESTRICTED EXPENDITURES

Pre-audit of expenses prevents costs that are not in compliance with federal regulations from being charged to sponsored projects. Submitted expenses are reviewed to determine if a specific charge based on current budget and expenditure information is allowable. If, after review, the charge is determined to be allowable, the invoice is approved for payment. If, however, the charge is considered unallowable, it will be returned to the department with an explanation.

If an expenditure is not budgeted, obtain the proper approval from the sponsor prior to incurring the charge(s).

### 850.00 TIME AND EFFORT REPORTING (Salary Certification)

Federal regulations require an effort reporting system to support and document salary charges to federal grants and contracts, as well as to determine the administrative effort charged in the facilities and administration cost rate. It is the responsibility of the department to ensure that its Time and Effort Reports are accurate. If salaries have been used as cost sharing this must be reported on the Time and Effort Report. A 40 hour week defines 1.0 FTE.

The reports are kept for grant documentation only and are not used by payroll. Thus grant-funded employees must complete both the online Banner time sheet and the paper time and effort report. Grant coordinator or project director explains time and effort requirements and procedures to affected employees and forwards electronic templates to employees.

After submitting Banner time sheet, employee fills out time and effort report, including a brief listing of activities during the pay period. For employees paid only partly with grant funds, the time and effort
report should include a brief listing of their non-grant funded activities as well. Hours reported on time and effort forms should match Banner time sheet.

Printed time and effort report is signed and dated by both employee and supervisor and kept on file by the grants accountant.

860.00 RE-BUDGETING

When a project’s financial resources need to be reallocated due to the nature and progress of the project, re-budgeting is required. For example, a certain piece of equipment might become unnecessary, while the allocation is needed in another budget category, or the scope of the project might have changed for some unforeseen circumstance.

Before re-budgeting, make sure you are aware of any sponsor requirements that apply to your award. You may find this information in the award document or contract.

Re-budgeting requires careful attention. Although it may seem easy to shift an expense from one category to another, the differences between line items that allow overhead costs and those that do not create the need for a specific formula adjustment to the F&A collection. Furthermore, if you are re-budgeting to or from a restricted class, you may need sponsor approval.

870.00 LOBBYING

Great Falls College MSU will comply with Federal and State regulations regarding use of funds for lobbying purposes.

890.00 Procedure for Reporting Instances of Suspected Fraud, Program Abuse and Criminal Conduct

Background

The detection and prevention of fraud and abuse in programs authorized by the Department of Labor should be a high priority. Great Falls College Montana State University (GFC MSU) may become aware of actual, potential or suspected fraud, or gross mismanagement or misuse of program funds. The Training and Employment Guidance Letter (TEGL) 2-12 provides the Department’s policy and procedures for reporting and investigating allegations of wrongdoing or misconduct to include allegations of suspected fraud, program abuse and criminal conduct involving grantees and other recipients of Federal funds.

GFC MSU Responsibilities

GFC MSU is responsible for following the procedures set forth in TEGL 2-12, as well internal policy 501.2 regarding fiscal misconduct. Allegations, suspicions and complaints involving possible waste, fraud, abuse or
criminal misconduct must be immediately documented using the incident reporting form (OIG 1-156). Situations involving imminent health or safety concerns, or imminent loss of funds exceeding $50,000 are considered emergencies. Emergencies must be immediately reported to the Office of the Inspector General and the Department’s Office of the Financial and Administrative Management (OFAM) by phone and with a written report using the incident reporting form (OIG 1-156), no later than one business day after the phone report. Refer to TEGL 2-12 for additional information.

Complaints Analysis Office
Office of Inspector General
200 Constitution Avenue NW, Room S-5506
Washington, DC, 20210
1-800-347-3756
hotline@oig.dol.gov

900.00 MISCELLANEOUS FORMS

The following forms and documents are available on the “Common K” drive, under the grants folder

- Hospitality Procedures Form
- Independent Contractor Checklist
- Contracted Services Agreement. This form is located on “K’ drive, forms folder

1000.00 LIST OF UNALLOWABLE COSTS (For Federal Projects)

The following costs, either direct or facilities and administration costs are unallowable on federal grants and contracts unless specifically approved in the grant or contract. For a more detailed explanation, please contact the Business Office. The source of this list of unallowable costs, and of most federal cost principles with regard to College and University management of federal funds is Federal Office of Management and Budget Circular A-21, which is electronically accessible via the World Wide Web. The Web site for OMB Circular A-21 is: http://www.whitehouse.gov/omb/circulars_a021_2004/

The unallowable costs are as follows:
- Advertising (depending on nature of the advertising)
- Public Relations Costs
- Alcohol
- Alumni Activity Costs
- Bad Debts
- Local Civil Defense Project Costs not on Institution's Premises
- Commencement and Convocation Costs
- Institution Furnished Automobile Costs for Personal Use
- Contingency Provision Costs
- Defense and Prosecution of Criminal and Civil Proceedings, Claims, Appeals and Patent Infringement Costs
- Depreciation Reserves Costs
- Donations or Contributions
- Entertainment Costs (includes amusement, diversion & social activities)
- Executive Lobbying Costs
- Fines and Penalties (including late fees)
- Goods and Services for Personal Use
- Housing and Personal Living Costs
- Insurance Costs to Protect against Defects in Institution’s Materials or Workmanship
- Interest, Fund-Raising and Investment Management Costs
- Lobbying Costs
- Losses on Other Sponsored Agreements
- Membership Costs in Civic Clubs, Community Organizations, Country Clubs, Social or Dining Clubs or Organizations
- Pre-agreement Costs Prior to Effective Date of Agreement
- Selling and Marketing Costs of Products or Services of the Institution
- Severance Costs in Excess of Institution’s Normal Severance Pay
- Specialized Service Facilities Charges in an amount more than aggregate costs of service over a long term period
- Student Activity Costs
- Airfare Travel Costs in Excess of Lowest Available Commercial Discount Airfare or Customary Standard Coach Airfare

1100.00 OTHER ELECTRONIC ADDRESSES FOR FEDERAL RESEARCH ADMINISTRATION INFORMATION

All OMB circulars can be found at [http://www.whitehouse.gov/omb/circulars_default](http://www.whitehouse.gov/omb/circulars_default)

- OMB Circular A-21
- Federal Cost Principles Circular - Includes info on Allowable and Unallowable Costs
- OMB Circular A-110
- Standards for Administration of Sponsored Projects at Higher Educational Institutions
- OMB Circular A-133
- Audits of States, Local Governments, and Non-Profit Organizations
- Code of Federal Regulations
- Federal rules governing grant programs.
- FirstGov – [www.firstgov.net](http://www.firstgov.net)
- (FirstGov is the first ever U.S. Government website that provides the public with a single on-line portal that connects to information and resources from all 27 million federal agency web pages. FirstGov allows citizens to search all on-line federal government resources from one site, conduct
searches by topic rather than by agency, and have access to federal government information 24 hours a day, 7 days a week.

1300.00 FINANCIAL DISCLOSURE POLICY

Great Falls College MSU’s Conflict of Interest and Financial Disclosure Policy is outlined in Policy No. 402.4 Conflict of Interest and Board of Regent’s Policy No. 770 – Conflicts of Interest. All grant personnel are required to read and follow these policies.
PROCEDURES

SUBJECT: Financial Affairs
Procedure: Grant Guidelines
Effective: July 2012
Revised: April 2016
Reviewed: April 2016

CODE OF CONDUCT FOR GRANT ADMINISTRATION

PREAMBLE

The College is committed to the highest standards of professional conduct; therefore all members of the College community who are participants in federally funded grants are expected to adhere to the highest ethical standards of professional conduct and integrity. The values we hold among ourselves to be essential to responsible professional behavior include: honesty, trustworthiness, respect and fairness in dealing with other people, a sense of responsibility toward others and loyalty toward the ethical principles espoused by the institution. It is important that these values and the tradition of ethical behavior be consistently demonstrated and carefully maintained.

DEFINITIONS

Members of the College Community: “Members of the College Community” or “members” mean individuals employed by the College and representatives who may speak or act as agents for the College, using College resources or facilities, or receiving funds administered by the College. Members do not include students taking courses, attending classes, or enrolled in an academic program unless they meet one of the former criteria.

Participant: Participant means any member of the College Community that is a Principal Investigator (PI), Co-PI, grant director, administrator, project manager, or serves in any capacity in the area of federal grant monies.

RIGHTS AND RESPONSIBILITIES

Fairness: Members of the College community who are participants in federally funded grants have the obligation to respect, and to be fair to other members, students and persons they supervise, and to foster intellectual and professional growth. Member must not abuse the authority they have been given and care must be taken to ensure that personal relationships do not result in situations that might interfere with objective judgment.

Professional Conduct: Work place and educational experiences must impart ethical standards of professional conduct through instruction and example. Members of the College community who are participants in federally funded grants are expected to conscientiously fulfill their obligations toward students, advisees, colleagues and performing their duties as part of the College community.

Compliance: Members of the College community who are participants in federally funded grants are expected to understand and comply with laws and regulations related to their duties. Members are responsible for adherence to College policies and procedures and are expected to comply with State and Federal laws. Members involved in the maintenance of personal and student data have the obligation to comply with FERPA. The College has the obligation to provide the opportunities necessary to assure awareness. Members are expected to see that those who report to them are informed about, understand and comply with regulations such as those for health and safety in the workplace.
**Authorship:** In an academic environment we continually seek after knowledge and understanding and must transmit our findings faithfully. Members of the College community who are participants in federally funded grants which result in scholarly products or works of art must guarantee the originality of their work and provide credit for the ideas of others upon which their work is built. All authors on a published work are responsible for the accuracy and fairness of the presented information.

**Peer Review:** Any material received by members of the College community who are participants in federally funded grants to review for funding or publication is confidential and the ideas contained therein must not be used in any other manner by the reviewer unless specifically permitted.

**Data Collection and Management:** Falsification, fabrication and unacknowledged appropriation of the data of others by members of the College community who are participants in federally funded grants is unethical and prohibited. Privacy of collected data and rights to intellectual property must be protected. Student rights to data are expected to be clearly specified.

**Fiscal Responsibilities:** Members in charge of budgets have an obligation to monitor records of expenditures for compliance with College policies and procedures and to allow these records to be viewed by appropriate parties. Departmental files are the property of the College.

**1400.00 Priority of Service**

1400.01 The requirement to provide priority of service applies to all programs that receive funding from the Department of Labor. At Great Falls College Montana State University, these programs are those associated with the Strengthening Workforce Alignment in Montana’s Manufacturing and Energy Industries (SWAMMEI), the Consortium for Healthcare Education Online (CHEO) and HealthCARE Montana. All program activities, regardless of how they are procured, must be administered in compliance with priority of service requirements.

**Background**

On December 19, 2008, the Department of Labor (DOL) issued new regulations (20 CFR 1010) implementing the Jobs for Veterans Act (JVA 2002) and the Veterans’ Benefits, Health Care, and Information Technology Act (2006). The regulations went into effect on January 19, 2009 and do the following:

Set forth requirements for each “qualified” program to provide priority of service for veterans and eligible spouses and require all grantees to have policies providing priority of service whether provided on-line or in-person;

Require that, for purposes of implementing priority of service, the broad definition of “veteran” meaning a person who served at least one day in the active military, naval, or air service, and who was discharged or released under conditions other than dishonorable be used (38 U.S.C. 101(2));

Add new requirements related to persons who physically access service delivery points or who access virtual service delivery programs on websites (See 20 CFR 1010.300);
Applicants to any “qualified” DOL programs and services must be able to learn about priority of service and to indicate whether they are veterans etc.; Program staff must initiate data collection for any person claiming priority at point of entry; and Applicants who are veterans must be given the menu of programs and services to which the priority applies, and any additional program eligibility requirements.

Understanding What it Means to Provide Priority of Service

“Priority of service” means, with respect to any qualified job training program, that a covered person shall be given priority over a non-covered person for the receipt of employment, training, and placement services provided under that program, notwithstanding any other provision of the law. This means that a veteran or an eligible spouse either receives access to a service earlier in time than a non-covered person or, if the resource is limited, the veteran or eligible spouse receives access to the service instead of or before the non-covered person.

For training programs, with competitive entry and where applicants are ranked on stated criteria, the priority of service applies only when the covered person is ranked equally to a non-covered person.

Identifying Veterans and Eligible Spouses

Veterans and eligible spouses must be given the opportunity to identify themselves at the point of entry to the system or program, and veterans and eligible spouses must be given the opportunity to take full advantage of the priority. When identifying veterans and eligible spouses, veterans and eligible spouses must be made aware of:

- Their entitlement to priority of service
- The full array of employment, training and placement services available
- Applicable eligibility requirements for programs and services

Eligibility for Priority of Service

Veterans and eligible spouses, including widows and widowers as defined in the statute and regulations, are eligible for priority of service. For the purposes of implementing priority of service, the broad definition of veteran found in 38 U.S.C. 101(2) is used:

- Veteran
  - A person who served at least one day in the active military, naval, or air service, and who was discharged or released under conditions other than dishonorable, as specified in 38 U.S.C. 101(2)
- Active service
  - Includes full-time Federal service in the National Guard or a Reserve component. Active service does not include full-time duty performed strictly for training purposes (i.e., that
which often is referred to as "weekend" or "annual" training), nor does it include full-time active duty performed by National Guard personnel who are mobilized by State rather than Federal authorities

- Eligible spouse defined at section 2(a) of the JVA (38 U.S.C. 4215[a]) means the spouse of any of the following:
  - Any veteran who died of a service-connected disability
  - Any member of the Armed Forces serving on active duty who, at the time of application for the priority, is listed in one or more of the following categories and has been so listed for a total of more than 90 days:
    - Missing in action
    - Captured in the line of duty by a hostile force
    - Forcibly detained or interned in the line of duty by a foreign government or power
  - Any veteran who has a total disability resulting from a service-connected disability, as evaluated by the Department of Veterans Affairs
  - Any veteran who died while a disability was in existence
    - A spouse whose eligibility is derived from a living veteran or service member would lose his or her eligibility if the veteran or service member were to lose the status that is the basis for the eligibility (e.g. if a veteran with a total service-connected disability were to receive a revised disability rating at a lower level). Similarly, for a spouse whose eligibility is derived from a living veteran or service member, that eligibility would be lost upon divorce from the veteran or service member.

The priority of service regulations refer to those veterans and spouses who are eligible for priority of service as "covered persons" and refer to those not eligible for priority of service as "non-covered persons." In the interest of specificity, this procedure refers to those eligible as "veterans and eligible spouses." However, in the interest of brevity, this procedure also adopts the regulatory terminology by referring to those who are not eligible as "non-covered persons."

Verifying Status

It is neither necessary nor appropriate to require verification of the status of a veteran or eligible spouse at the point of entry, unless the individual who self-identifies as a veteran or eligible spouse:

- is to immediately undergo eligibility determination and be registered or enrolled in a program, and
- the applicable federal program rules require verification of veteran or eligible spouse status at that time

Even in those instances in which eligibility determination and enrollment occur at the point of entry, a veteran or eligible spouse should be enrolled and provided immediate priority and then be permitted to follow-up subsequently with any required verification of his or her status as a veteran or eligible spouse.

After providing the appropriate priority of service to self-identifying veterans or eligible spouses, source
documentation should be obtained to demonstrate a student is an eligible veteran or the spouse of an eligible veteran by identifying and having on file a copy of either their DD 214, Military ID Card, or VA documents or official college documentation that demonstrates eligibility and that used one of those documents to verify eligibility.

**Applying Priority of Service**

- Grantees and sub-grantees must comply with federal law, regulations, and guidance on priority of service, using the broad definition for veterans and eligible spouses (20 CFR 1010.110).
- Veterans and eligible spouses must receive priority of service over all other program participants.
- Veterans and eligible spouses receive the first level of priority in universal access programs.
- Veterans and eligible spouses receive the first level of priority in any program or service that uses technology to assist individuals to access workforce development programs (such as job and training opportunities, labor market information, career assessment tools such as NCRC, and related support services).
- For discretionary services, like SWAMMEI Inside Track coaching, eligible veterans expressing an interest in being coached will be given priority over other students.

**Measurements**

- Data records and reports on covered participants and entrants will be available in the data tracking system.
- Training will be conducted for Project Coordinators on Priority of Service.

**References**

- Veterans Program Letter (VPL) No. 07-09 Issued Nov. 10, 2009