

**Northern Vermont University
Title III Strengthening Institutions
Policies and Procedures
January, 2021**

Note: This manual is intended primarily for those who are managing and implementing Northern Vermont University’s Title III grant. It is meant to ensure that all project and other staff have a clear understanding of the procedures and necessary activities for successful grant management and to provide consistent management guidance in the event of program staff changes. Wherever possible, brief sections include links to authoritative documents. For each hyperlink a full URL is provided to assure the integrity of links as well as user safety in accessing them.

Grant Program and Award

In October 2018, Northern Vermont University-Johnson (formerly Johnson State College) was awarded a five-year, \$1,816,525 grant through the U.S. Department of Education’s Title III, Part A Strengthening Institutions Program. The purpose of the Title III program is to help eligible institutions of higher education become self-sufficient and expand their capacity to serve low-income students by providing funds to improve and strengthen academic quality, institutional management, and fiscal stability.

The grant program is governed by legislation contained in Title III, Part A, Sec. 311-315 of the Higher Education Act (HEA) of 1965, as amended:

<https://www.law.cornell.edu/uscode/text/20/chapter-28/subchapter-III/part-A>

Program regulations are contained in Title 34 Code of Federal Regulations (CFR) Part 607 – Strengthening Institutions Program:

<http://www.gpo.gov/fdsys/pkg/CFR-2013-title34-vol3/pdf/CFR-2013-title34-vol3-part607.pdf>

Other relevant portions of federal regulations govern Uniform Administrative Requirements (Title 2 CFR Part 215) and Cost Principles for Educational Institutions (Title 2 CFR Part 220):

<http://www.gpo.gov/fdsys/pkg/CFR-2013-title2-vol1/pdf/CFR-2013-title2-vol1-part215.pdf>

<http://www.gpo.gov/fdsys/pkg/CFR-2013-title2-vol1/pdf/CFR-2013-title2-vol1-part220.pdf>

The award, which spans October 1, 2018 to September 30, 2023, supports NVU’s project on “Success in the First Year and Beyond: Transforming Curriculum and Academic Support Systems.”

For all project activities, the guiding document is the approved project proposal and budget, copies of which may be requested from the President’s Office.

Formal notice of the award was received via a [Grant Award Notification \(GAN\) from the U.S. Department of Education](#)

Our grant award number (used for all correspondence and communications) is P031A180007.

The GAN is a legal agreement that states the amount and conditions of an award.

The approved project supported by the grant is “Success in the First Year and Beyond: Transforming Curriculum and Academic Support Systems.” Four project strategies guide this initiative: Centralize and improve advising and student success services; Increase student engagement and experiential learning; Establish center for teaching excellence; Build NVU endowment.

All grant-supported initiatives, activities, systems, and processes must align with and connect to the goals/objectives and/or strategies contained in the approved proposal. Those goals/objectives and/or strategies are in turn aligned with the NVU mission.

Grant funds may be used to support either or both campus(es) of Northern Vermont University. A 2020 policy decision by the Project Director and supported by the External Evaluator makes it possible to use grant funds for improvements at both locations, in light of NVU’s status as a single institution that includes both Johnson and Lyndon campuses.

Project Director

The Project Director has the prerogative and responsibility to determine whether a proposed initiative, activity, system or process aligns with the grant.

The Project Director has the sole authority to approve a grant expenditure. The President may veto any such expenditure. In making that determination the Project Director takes into account alignment with the approved project proposal and budget, Title III program standards for financial management, as well as existing NVU and VSCS procedures that govern all expenditures. The VSCS grants compliance officer reviews approved expenditures for compliance.

The Project Director operates under Expanded Authority, which gives grantees discretion to undertake certain types of administrative actions without prior Education Department approval:

<https://www2.ed.gov/about/offices/list/oela/expandau.html#:~:text=%20The%20Education%20Department%20General%20Administrative%20Regulations%20%28EDGAR%29,a%20planned%20extension%20at%20least%2010...%20More%20>

Specifically, Expanded Authority amendments to EDGAR permit grantees: To extend grants automatically at the end of a project period for a period of up to one year without prior approval (with certain exceptions); To carry funds over from one budget period to the next; To obligate funds up to 90 days before the effective date of a budget period without prior approval; and To

make transfers of funds among budget categories without prior approval, except for a limited number of specified cases.

Title III Committee

A Title III committee meets regularly with and advises the Project Director, who invites and appoints staff and faculty members to serve. When the meeting agenda warrants, university administrators (e.g., the President and/or Provost) may also be invited to participate. The body functions as a steering committee to advance various aspects of the Title III project. Its members work collaboratively with project staff to ensure project activities are implemented efficiently and effectively. Committee members also serve on search committees to hire personnel supported by the Title III grant (see below).

Budget

In line with the grant project proposal, for positions expected to be maintained after the award period ends, NVU gradually assumes salaries by increasing its share of personnel costs by 20%, 40%, 60%, and 80% (Years 2-5). Exceptional circumstances may lead to modifications in this schedule. Modifications require the approval of the President and Title III External Evaluator.

On the anniversary of grant-funded positions, the Project Director notifies payroll as to the institutional- and grant-funded (NVU vs. Title III) shares of personnel costs for the upcoming year.

Every three months budget reports from the Chancellor's Office should be reconfigured to match the budget categories found in the grant proposal.

Major changes in the project budget—for instance, in the scope, the objective, or in key personnel of the project, or major deviations from the approved budget—must receive prior approval from the Program Officer assigned to this grant. As of the current writing, the PO for NVU's Title III grant is Ms. Yolande Badarou (Yolande.Badarou@ed.gov; 202-453-7838).

Endowment

NVU-J increased its endowment fund with a previous Title III award; still, the endowment needs to grow to meet institutional and student needs. Hence a substantial increase in the endowment is part of the approved budget for the current Title III project, facilitated by a 1:1 federal to non-federal dollar match. Interest earned from an increased endowment also helps to support the implementation of Title III project initiatives.

34 CFR Part 628 of the Code of Federal Regulations covers the rules and regulations of the Endowment Challenge Grant Program:

<https://www.law.cornell.edu/cfr/text/34/part-628>

or

<https://www.ecfr.gov/cgi-bin/retrieveECFR?gp=1&SID=0d7db919183b2e53717f73ddb6b3e79c&ty=HTML&h=L&mc=true&n=pt34.3.628&r=PART#sp34.3.628.b>

For purposes of the grant, the endowment matching provision is one of the items (along with those under Personnel, Travel, Contractual, etc.) that is part of the approved budget. No separate agreement governing the endowment match provisions of the Title III grant is necessary. No special process exists for endowment match drawdowns, which are treated like the drawdowns for other budget items, requiring the Project Director's approval.

A High-Impact Fund for teaching and learning activities was created as an endowment in 2019. The High-Impact Fund is a repository for non-federal dollars received as contributions as well as federal match dollars for approved Title III activities. The Fund is in accordance with VSC Policy 412: Endowments, Gifts, and Quasi-Endowments:

<https://www.vsc.edu/wp-content/uploads/2016/10/Policy-412-Endowments-Gifts-and-Quasi-Endowments.pdf>

In light of the High-Impact Fund's inclusive description, the Title III Project Director has been willing to grant, for contributions to this fund, a priori approval for Title III match drawdowns. The Project Director should be informed on a regular basis of the amounts contributed (and thus to be drawn down). The list of amounts should be accompanied by a brief description of the donor's intent behind each gift.

The Project Director should provide quarterly reminders to the University Development Officer and VSCS grant accountant to ensure that matching endowment funds are drawn down.

Institutions may spend up to 50% of endowment income during the grant period, calculated up to the time of the proposed expenditure. After the grant period concludes, there is no such restriction.

Those funds may also be used for scholarships. As this November 6, 2019 determination came from Ms. Nalini Lamba-Nieves, Strengthening Institutions Program Lead, it should be considered authoritative.

Northern Vermont University invests endowment funds in accordance with the Vermont State Colleges investment policy:

Policy 430 Endowment Investment and Spending Policy

<https://www.vsc.edu/wp-content/uploads/2016/10/Policy-430-Endowment-Investment-and-Spending-Policy.pdf>

Policy 430 VSCS Investment Policy Statement

<https://www.vsc.edu/wp-content/uploads/2016/10/Policy-430-VSC-Investment-Policy-Statement.pdf>

Although further endowment regulations are awaiting re-authorization of the HEA, it is clear that an institution may not withdraw or expend any of the endowment fund corpus at least during the grant period, which is five years.

The endowment must be held by the institution, not by the institution's foundation (if any).

Reporting on Program Performance

APR: Each fiscal year an Annual Performance Report is due. All grantees are required to complete the APR. Non-competing continuation awards are not made to grantees who fail to complete the APR. Once the system closes at 11:59 p.m. on the final day, it cannot be reopened to accommodate late submissions.

Two-factor authentication is required for logging into the federal system for reports. Instructions for the log-in process are available when the system opens.

Generally, APRs are due 90 calendar days after the grant year concludes (usually by December 31). The 90 days begin once the U.S. Department of Education sends an email indicating that the (electronic) system to complete the report is open.

The timing for reports can (and does) vary, however. The Fiscal Year (FY) 2019 Annual Performance Report (APR) system, for instance, opened on January 6, 2020 and closed on March 6, 2020. The system was open for 61 days.

Whatever the timing of the required report, there should be ample time to meet its demands. Annual Performance Reports generally must contain: A comparison of actual accomplishments with the goals and objectives established for the period; reasons why established goals were not met, if appropriate; other pertinent information including, when appropriate, analysis and explanation of cost overruns or unexpended funds.

For the comparison of accomplishments with the goals and objectives established for the report period, NVU-Johnson data alone should be used. That is because the original baseline data, against which current performance is measured, is NVU-J data.

Final Performance Report: A Final Performance Report is due 90 calendar days after the expiration or termination of the award.

Endowment reportage: In addition to the APR, a separate report via the Endowment Financial Reporting System is required annually on the endowment and match.

Time and effort reports: The VSCS grants manager completes time and effort reports and sends them to the Project Director, who checks the forms and obtains signatures from the employees themselves. The Project Director then returns the signed forms to the VSCS grants manager.

Hiring Title III Personnel

The hiring procedure for individuals supported by Title III funds follows the current hiring practices of Northern Vermont University. Generally, the Project Director chairs search committees for Title III-supported personnel. Title III Committee members are often invited to serve. As usual the President must approve any hire, before an offer of employment can be made.

Project Evaluation and Assessment

As described in the project proposal, evaluation involves: (1) assessing the extent to which the achievement of objectives and implementation strategies has been met; (2) assessing the degree of effectiveness of the objectives and implementation strategies; (3) determining how the achievement of objectives helped to address institutional weaknesses and challenges laid out in the approved proposal (pp.7-14); and (4) evaluating the project's impact on promoting the growth and self-sufficiency of the institution.

The Project Director, assisted by institutional researchers and other Title III and NVU personnel, has overall responsibility for the evaluation activities.

An External Evaluator provides an evaluation of project implementation and the achievement of objectives on an annual basis. Overall, the external evaluation is intended to serve as an objective assessment of progress being made toward meeting objectives and institutionalizing project strategies, as well as assessing the degree to which the project's progress is contributing to solving institutional problems. Together with the Annual Performance Reporting system (see above), annual evaluations by an external evaluator help ensure necessary accountability.

Our external evaluator is Kay Floyd, President and Principal Consultant of the Kay Floyd Consulting Group. Each year she assesses the overall effectiveness of the Title III project; advises staff regarding evaluation instruments and the collection/analysis of data; makes recommendations for improvements; conducts a site visit to review project documents/reports and interview staff and other participants; and provides a written report, which is received by the Project Director and shared with the President, among others.

Prior to each site visit, the Project Director, assisted by institutional researchers as well as other Title III and NVU personnel, provides the External Evaluator with relevant materials: (1) Data on objectives for the grant year under review; (2) A report of project activity including a summary of accomplishments and challenges; (3) A copy of the most recent APR; (4) A budget summary by grant category; and (5) Any other reports, data, feedback, or documents that may be helpful to show activities during the grant year under review.