

Review of Grants Policies, Procedures and Practices

September 20, 2022



Riverside Community College District

Michael H. Fine
Chief Executive Officer

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**FISCAL CRISIS & MANAGEMENT
ASSISTANCE TEAM**

September 20, 2022

Wolde-Ab Isaac, Ph.D., Chancellor
Riverside Community College District
3801 Market St.
Riverside, CA 92501

Dear Chancellor Isaac:

In November 2021, the Riverside Community College District and the Fiscal Crisis and Management Assistance Team (FCMAT) entered into an agreement for FCMAT to conduct a review of the district's and colleges' policies, procedures, and practices in place to support effective grant development, submission and management. The agreement stated that FCMAT would perform the following:

1. Review and analyze operational processes and procedures that support grant development and management between and among the colleges and district office, including but not limited to business procedures, grants department, and human resources, and make recommendations for improved efficiency, clarity of roles, responsibilities, and decision making, if any. Ensure the who, what, where, why, when and how aspects of relevant processes are identified (or perhaps established) and understood (e.g., process mapping).
2. Evaluate the current workflow and distribution of functions for grant development and management, and make recommendations for improvements, if any.
3. Identify resources necessary to carry out an effective grants process based on FCMAT's recommendations.

This report contains the study team's findings and recommendations.

FCMAT appreciates the opportunity to serve the Riverside Community College District and extends thanks to all the staff for their assistance during fieldwork.

Sincerely,

A handwritten signature in black ink that reads "Michael H. Fine". The signature is written in a cursive, flowing style.

Michael H. Fine
Chief Executive Officer

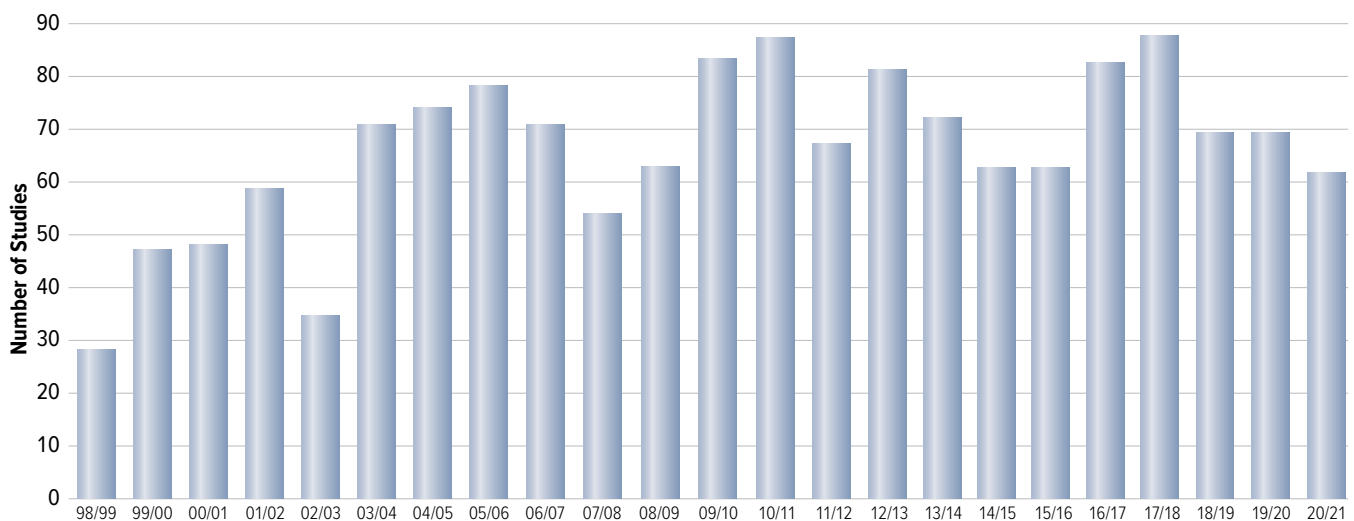
About FCMAT

FCMAT's primary mission is to assist California's local K-14 educational agencies to identify, prevent, and resolve financial, human resources and data management challenges. FCMAT provides fiscal and data management assistance, professional development training, product development and other related school business and data services. FCMAT's fiscal and management assistance services are used not just to help avert fiscal crisis, but to promote sound financial practices, support the training and development of chief business officials and help to create efficient organizational operations. FCMAT's data management services are used to help local educational agencies (LEAs) meet state reporting responsibilities, improve data quality, and inform instructional program decisions.

FCMAT may be requested to provide fiscal crisis or management assistance by a school district, charter school, community college, county office of education, the state superintendent of public instruction, or the Legislature.

When a request or assignment is received, FCMAT assembles a study team that works closely with the LEA to define the scope of work, conduct on-site fieldwork and provide a written report with findings and recommendations to help resolve issues, overcome challenges and plan for the future.

Studies by Fiscal Year



FCMAT has continued to make adjustments in the types of support provided based on the changing dynamics of K-14 LEAs and the implementation of major educational reforms. FCMAT also develops and provides numerous publications, software tools, workshops and professional learning opportunities to help LEAs operate more effectively and fulfill their fiscal oversight and data management responsibilities. The California School Information Services (CSIS) division of FCMAT assists the California Department of Education with the implementation of the California Longitudinal Pupil Achievement Data System (CALPADS). CSIS also hosts and maintains the Ed-Data website (www.ed-data.org) and provides technical expertise to the Ed-Data partnership: the California Department of Education, EdSource and FCMAT.

FCMAT was created by Assembly Bill (AB) 1200 in 1992 to assist LEAs to meet and sustain their financial obligations. AB 107 in 1997 charged FCMAT with responsibility for CSIS and its statewide data management work. AB 1115 in 1999 codified CSIS' mission.

AB 1200 is also a statewide plan for county offices of education and school districts to work together locally to improve fiscal procedures and accountability standards. AB 2756 (2004) provides specific responsibilities to FCMAT with regard to districts that have received emergency state loans.

In January 2006, Senate Bill 430 (charter schools) and AB 1366 (community colleges) became law and expanded FCMAT's services to those types of LEAs.

On September 17, 2018 AB 1840 was signed into law. This legislation changed how fiscally insolvent districts are administered once an emergency appropriation has been made, shifting the former state-centric system to be more consistent with the principles of local control, and providing new responsibilities to FCMAT associated with the process.

Since 1992, FCMAT has been engaged to perform more than 1,400 reviews for LEAs, including school districts, county offices of education, charter schools and community colleges. The Kern County Superintendent of Schools is the administrative agent for FCMAT. The team is led by Michael H. Fine, Chief Executive Officer, with funding derived through appropriations in the state budget and a modest fee schedule for charges to requesting agencies.

Introduction

Background

The Riverside Community College District serves students in Riverside County with an enrollment of 60,591 students in 2020-21. The district offers certificates, degrees, and transfer programs at three colleges: Moreno Valley College with 14,768 credit students, Norco College with 15,724 credit students, and Riverside City College with 30,099 credit students in 2020-21.

In November 2021, the district requested that FCMAT review the district's and colleges' policies, procedures, and practices to support effective grant development, submission and management.

Study and Report Guidelines

FCMAT held teleconference interviews with staff, faculty and administrators of the district and colleges between January 20 and March 9, 2022 to gather information necessary to understand the flow of grants as well as any issues or constraints. Twenty-three interviews were conducted with college and district grants and fiscal staff as follows:

- District (5)
- Moreno Valley College (6)
- Norco College (5)
- Riverside City College (7)

Comprehensive interviews covered topics ranging from selecting project directors to fiscal accountability. The responses of each college and district staff member were mapped according to the following grant categories:

- Identifying grants for possible adoption
- Developing a work plan, selection of a project director and budget development
- Managing subgrantees
- Submission of grants for approval
- Communicating the status of preaward grants
- Action after approval from the district board and the funding source
- Preparation of grant staff prior to grant implementation
- Implementing the grant
- Recording and preparing grant expenditures
- Reviewing expenditures incurred by subgrantees
- Closing the grant
- Storage of grant documents

Following fieldwork, FCMAT reviewed and analyzed data and documents. This report is the result of those activities.

FCMAT's reports focus on systems and processes that may need improvement. Those that may be functioning well are generally not commented on in FCMAT's reports. In writing its reports, FCMAT uses the Associated Press Stylebook, a comprehensive guide to usage and accepted style that emphasizes conciseness and clarity. In addition, this guide emphasizes plain language, discourages the use of jargon and capitalizes relatively few terms.

Study Team

The study team was composed of the following members:

Michelle Giacomini
FCMAT Deputy Executive Officer

Cambridge West Partnership, LLC
FCMAT Consultant

Carolynne Beno, Ed.D., CFE
FCMAT Intervention Specialist

Leonel Martínez
FCMAT Technical Writer

Each team member reviewed the draft report to confirm accuracy and achieve consensus on the final recommendations.

Executive Summary

The Riverside Community College District is composed of Moreno Valley College, Norco College, and Riverside City College, each with a distinct grant-related responsibility. Each college and the district have an individual with a unique title and responsibilities who is assigned to oversee and coordinate all grant activities. The overall organizational structure at the district and colleges is appropriate to support pre- and post-award grant activities.

The district and its colleges have not adopted a standard grant workflow to optimize the movement of grants between the evaluation, authorization, approval, funding, implementation, and closeout stages. The lack of formalized procedures causes frustration at all levels of the district. Staff reported inconsistencies with grant processing and management that contribute to delays and confusion regarding roles and responsibilities. The district board does not consistently authorize grants before submission, and some grants have been implemented prior to Resolution(s) to Amend Budget to the county office of education. The lack of institutionalized (formally adopted) grant workflows, roles and responsibilities, tracking software and forms, and formalized training contribute to the delays and confusion at the district and college levels.

Once workflows are adopted, the district would benefit from enhancing pre- and post-award grant management support and accountability. The district's Office of Grants and Sponsored Programs (Office of GSP) should develop and provide a formal training program for all district and college grant project directors and their assigned staff who will monitor grant expenditures and reporting. As part of the training program, the project directors at the colleges should be required to collaborate regularly (e.g., monthly) with the staff assigned to their grant to monitor expenditures and reporting requirements. Project directors and staff need clear guidelines for post-award grant expenditure reports and would benefit from the district adopting grant management software to manage and monitor grants.

The role of the Office of GSP is to serve as the district's centralized grants management office. This centralized role should focus on the business, compliance, and training aspects of grant management. The colleges will need clear guidelines, forms, roles and responsibilities to better understand and follow the adopted workflow to remain in compliance. FCMAT believes the colleges and the district have equally important roles in grant-related activities. The development and delivery of work plans that support positive student and faculty outcomes is the primary mission of any grant. To maintain autonomy at the colleges, each college's grants department, project directors, and business office will need to coordinate at a high level and be trained on compliance measures such as allowable versus unallowable expenses, the chart of accounts, and reporting related timelines.

When staff at the colleges and the district were interviewed about grant processing procedures to identify concerns, they developed potential solutions that can assist in efficiency, flow and compliance for grant processing. One of the outcomes of the interviews was to gather information that will improve coordination efforts between the district office and the colleges. FCMAT's recommendations balance overall efficiency while continuing to support students, programs and innovation at the colleges, which is where the goals and outcomes of a grant are established and achieved. The district office and colleges should adopt pre- and post-award grant workflow models before identifying roles and responsibilities to ensure all fiscal compliance, college and district approvals and oversight requirements are met.

This report outlines the next steps to develop and implement a comprehensive grants management process. The process recommended by FCMAT allows the colleges to have the autonomy needed to best serve their students and community while giving the Office of GSP the oversight and responsibility to maintain compliance and facilitate the colleges' efforts.

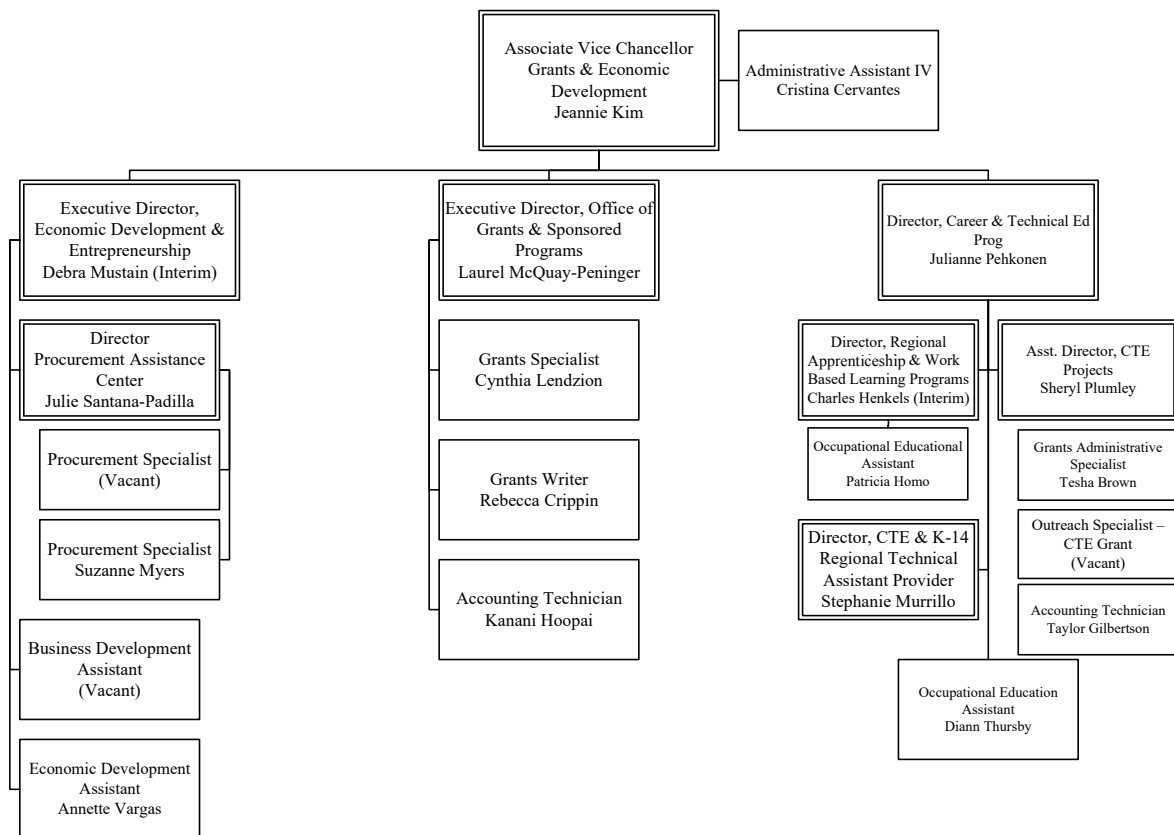
Findings and Recommendations

Current Organizational Structure & Staffing

The district has four distinct grants offices, one at each college within the Office of Planning and Development Department and one at the district in the Office of Institutional Advancement & Economic Development Department. Each college and the district have personnel assigned, serving in a dean of grants role, to oversee and coordinate all grant activities. Each entity has assigned this role to a different position, and since these positions may have other nongrant-related roles and responsibilities assigned that vary by college, their titles are distinct. Simplified versions of the district and colleges' organizational charts, depicting positions associated with dean of grants activities, are shown below.

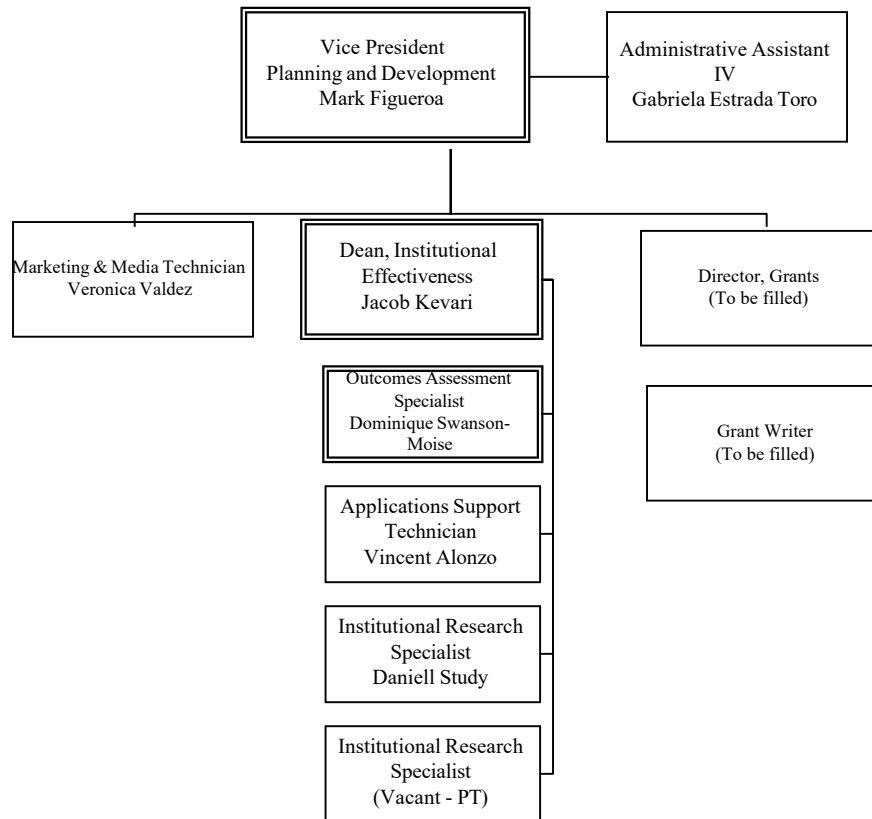
Riverside Community College District

Institutional Advancement and Economic Development – Grants & Economic Development



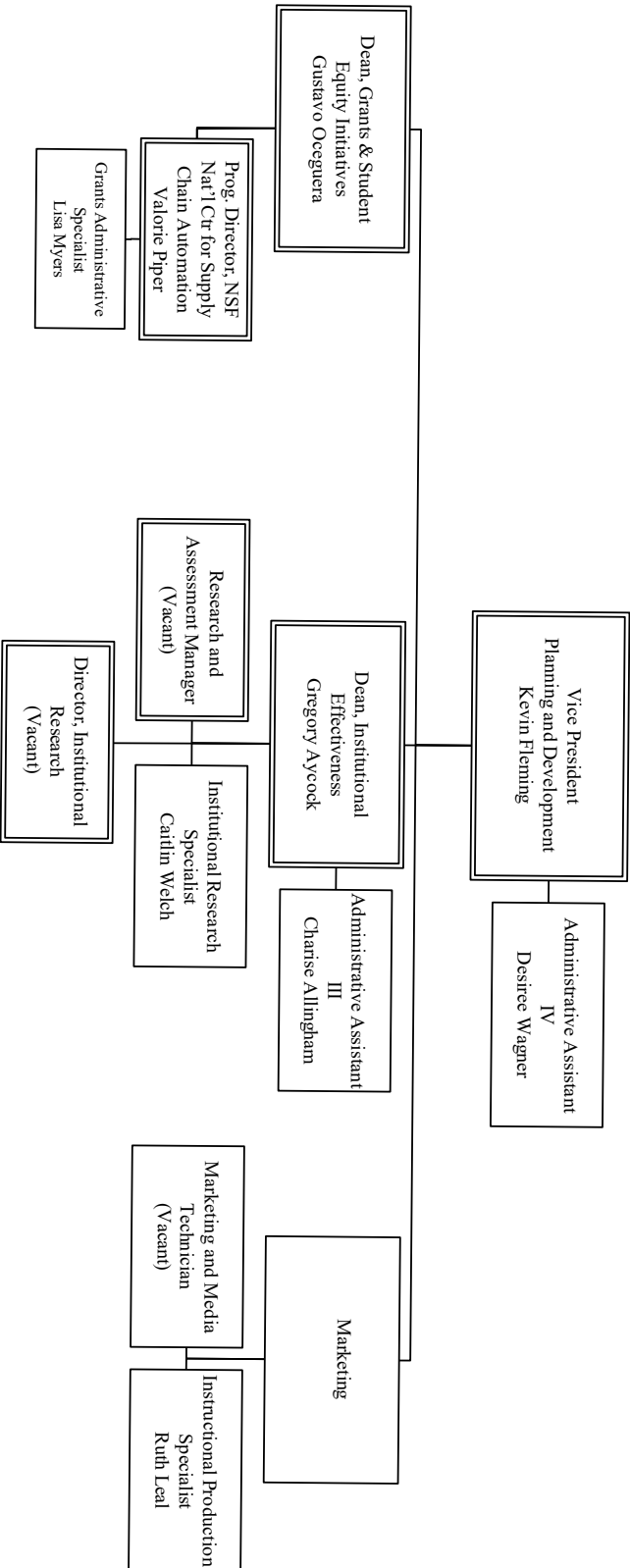
Riverside Community College District

Moreno Valley College – Planning & Development



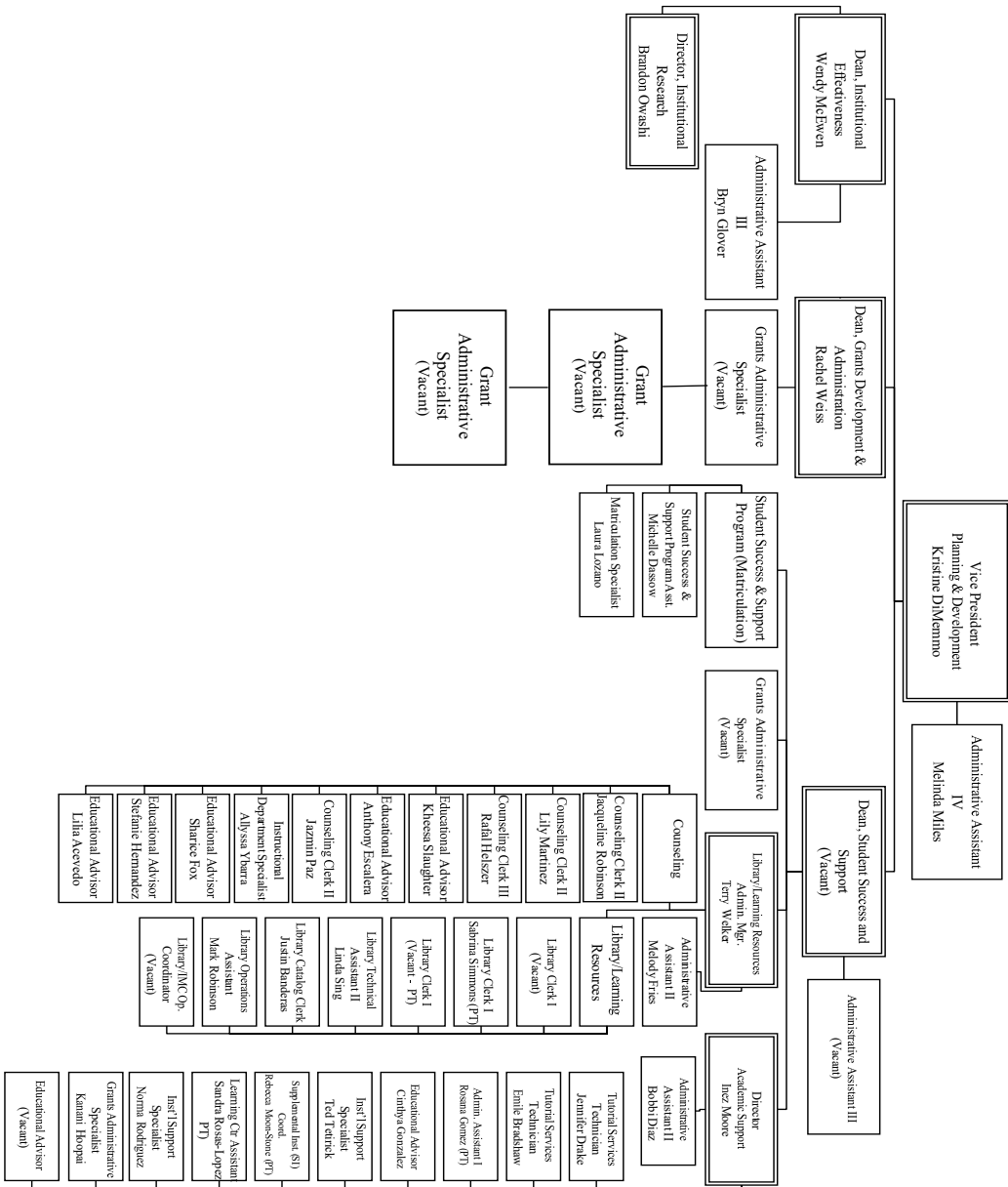
Riverside Community College District

Norco College – Planning and Development



Riverside Community College District

Riverside City College – Planning and Development



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Considerations for Improvement of the Grants Process and Workflow

The charts below capture the current process, concerns and considerations for improvement of the grants process and workflow at the district and colleges.

Grant Activity	Riverside City College (RCC)	Norco College (Norco)	Moreno Valley College (MVC)	District	Concerns and Considerations
1. Preeward - Identifying grants for possible adoption.	The dean of grant development and administration oversees the development of grant applications and is the primary grant writer. The dean working in conjunction with faculty and staff regularly research and identify potential grant opportunities that align with college priorities and goals. As necessary, the Business Services Department is requested to provide cost information that may be relevant in the decision-making process.	Norco uses a grant proposal information form that outlines all aspects of a grant opportunity. Funding opportunities aligned with the college's institutional priorities are forwarded to a grants advisory panel for vetting and recommendations. This panel includes staff from student services, academic services, and business services. When necessary, other constituents are requested to assist in vetting grant opportunities. The dean of grants forwards recommendations to the president for consideration and approval to apply.	At the time of interviews, MVC does not have a person who oversees the grant function at the college. Program staff identify grant opportunities and refer those that are interesting, appropriate, and relevant to the supervisor for consideration. The supervisor reviews the opportunity and determines if the college has the interest and capacity to pursue the grant. The grant supervisor submits the grant to the area vice president for submission to the college cabinet for review and approval. The college cabinet includes the president and all the vice presidents, including the vice president for business services. Moreno Valley College recently hired a new dean of grants. This dean indicated that he should be the hub of all grant-related activities. The Business Services Department generally does not participate in the grant identification stage.	Staff regularly research and identify potential grant opportunities that align with district/college priorities and goals. Open and emerging grant opportunities are reviewed for relevance and applicability and forwarded to the respective college grant deans and/or program staff. Grants that will be pursued by the colleges are reviewed and vetted by the colleges; grants that will be pursued by a district function are reviewed by the appropriate vice chancellor.	LACK OF COORDINATION IN SELECTING GRANTS 1. All potential grants should be referred to and coordinated by the college's dean of grants. 2. Even at the evaluation stage, the college's Business Services Department should participate to provide budget information and total cost of ownership. 3. Upon selection, a probable project director should be identified and available to expedite development of the work plan.

Grant Activity	Riverside City College (RCC)	Norco College (Norco)	Moreno Valley College (MVC)	District	Concerns and Considerations
2. Preaward - Upon identifying a grant opportunity, a project director is identified either from the college or as necessary, engaging an outside consultant. The dean of grants coordinates the development of a work plan, identifying a grant writer and preparation of a budget with the assistance of the college's Business Services Department. There are no written guidelines on their roles and responsibilities.	Project directors are asked to manage the grant based on their background and willingness to manage the project. There is a need for defined roles and responsibilities of all grant participants. There should be more consistency on how grants are identified, how the work plan is developed, selection of the grant writer and budget development.	No information was provided.	No information was provided.	A planning group with the background knowledge is assembled to evaluate potential grants. As necessary, a third-party grant writer is hired. Concern was raised that some grants are developed without a budget until late in the process, and that some project directors are over-extended, leading to poor management of the grants.	LACK OF DEFINITIVE ROLES AND RESPONSIBILITIES 1. The dean of grants should assemble a committee made up of staff with different expertise that can be called on as needed to evaluate grant opportunities and decide on adoption. 2. The dean of grants should coordinate all activities relating to grant writing, development of the work plan and development of a budget. 3. There should be written guidelines defining the roles and responsibilities of the dean of grants, the project directors, faculty, staff and the Business Services Department. 4. The dean of grants should ensure that project directors are not overextended by managing multiple grants.

Grant Activity	Riverside City College (RCC)	Norco College (Norco)	Moreno Valley College (MVC)	District	Concerns and Considerations
3. Preaward - Managing sub-grantees.	The project director coordinates with the subgrantee to discuss the work plan, the costs of the project and how the task may be divided. There are no written guidelines on how to manage projects with subgrantees.	There are no written guidelines regarding the work plan, expenditures, budget, and reviewing subgrantees' monthly expenditures. The dean of grants and business services provide assistance to project directors to discuss the work plan, budget, and how to set up and manage subgrantees. The business office works with the district to process subgrantees' reimbursement requests. Project directors collect and maintain grant expenditures documentation as required by funding agency. The college administration decides how the work plan and budget can be divided. There is no arrangement on how subgrantee costs will be reported as required by the funding source. There are no written guidelines on how to manage projects with subgrantees.	The project director makes every effort to communicate with the subgrantee to determine the extent of the subgrantee's participation. Subgrantee cost is included in the overall budget but only the college portion of the grant is tracked. No arrangements for reviewing expenditures of the subgrantee are in place. There are no written guidelines on how to manage projects with subgrantees.	As necessary, the assigned project director will consult with the subgrantee to discuss the work plan and costs. There are no written guidelines on how to manage projects with subgrantees.	LACK OF COORDINATION WITH SUBGRANTEES 1. The dean of grants and the assigned project director should develop the work plan and subsequently work in tandem with the subgrantee. Written guidelines should be developed on dealing with a subgrantee including their portion of their work plan, status of their portion of the project and incurred expenditures.

Grant Activity	Riverside City College (RCC)	Norco College (Norco)	Moreno Valley College (MVC)	District	Concerns and Considerations
4. Preaward - Submission of grants for approval.	There are no formal guidelines on how and who reviews grant applications. However, in general, as grants are developed, the dean of grants communicates application progress to the VP of planning and development and/or president. Prior to submission, the project director/project supervisor reviews and edits as necessary application content. If the grant is federal, the dean of grants will send the application packet to the district grants office for submission. If the grant is state or local, the dean will submit unless the district has the capacity to do so.	Norco's Proposal Information Form lists potential individuals and/or groups that may need to approve various aspects of a grant application, including: - Supervisor - Department - Academic Senate - Vice president business services - College president Depending on the nature of the grant and the personnel involved, approvers may be individually selected. Federal grants are forward-ed to the Office of GSP for submittal; however, some state grants are submitted directly to the funding source, as well as grants that are required to be submitted through the foundation.	There is no formal written process for reviewing grant applications prior to submission. However, in most cases, the narrative is reviewed and edited by the project team. The budget is reviewed by the business services manager and sent to the vice president of business services and to the college president for authorization. Federal grants are routed to the Office of GSP; however, some state grants are submitted directly to the funding source.	Grant applications processed by the district are authorized by the executive director of grants at the district and forwarded to the district board and the funding source. The District Grants Office submits all federal grants on behalf of the colleges and will submit state and local grants upon request. The Grant Development Team, led by the grant writer, prepares the application packet for submission. When complete, the grant writer submits grant documents to the grant specialist who uploads each document into the system. Prior to submission, the grant is reviewed by the project team, the respective dean/director of grants at the college(s), and the executive director of grants. Budgets are reviewed by the respective Business Office. Once approvals are granted, the grant specialist and/or executive director grants, hits submit.	LACK OF CONSISTENT APROVAL PROCESS To achieve consistency, complete the following: - After approval at the college level, all grant applications should be forwarded/transmitted to the executive director of grants at the district for compliance review. Grant applications are different from contracts that require college approval only up to a certain limit. - Grant application authorization at the college level should be limited to the college president. - After reviewing for compliance, the district should forward the grant application to the district board and funding source for approval and a resolution to amend budget to the county office of education.

Grant Activity	Riverside City College (RCC)	Norco College (Norco)	Moreno Valley College (MVC)	District	Concerns and Considerations
5. Preaward - Communicating the status of preaward grants.	The status of grant development is submitted monthly to the district with information including grant applications submitted and grants awarded.	Norco prepares an Excel spreadsheet that lists all funding received via direct allocations or competitive sources, Education Master Plan goal alignment, amount of award, project director, grant description, and beginning and end date. This spreadsheet is provided to the Resources Council bimonthly. The spreadsheet also lists all pending submissions, applications in process, and unsuccessful applications that were evaluated but not considered.	No formal report is prepared that provides information regarding the number of awards considered, if the work plan is developed, or the funds to be obtained by the grant. However, the information is available and can be obtained on an as-needed basis.	GSP maintains a list of all grants submitted and awarded throughout the year. GSP works with the lead grant officer at each college to collect the number of grants submitted and awarded each month and prepares a consolidated report that is provided to the chancellor monthly. This report includes the funding source, the name of the grant, the purpose of the grant, and the total requested. As applications are awarded or declined, the annual list is updated. At the end of each academic year, GSP closes out the list of grants submitted and awarded, making sure that each grant is accounted for, and presents a summary of this information to the board of trustees. However, the information on the reports is like that prepared by the colleges.	LACK OF COMMUNICATION ABOUT PREAWARD GRANTS 1. A report should be prepared monthly for all grants in the preaward stage. Information in this report should include the following: • Name of the grant • Grant description • Estimated funding • Status – if approved • Description of the grant • Beginning and end dates Information in this report should be the same for all colleges and the district. It should be distributed to designated college officials and the district.

Grant Activity	Riverside City College (RCC)	Norco College (Norco)	Moreno Valley College (MVC)	District	Concerns and Considerations
6. Preaward - Action before and after approval from the district board and the funding source.	Preparation of the request for grant approval from the board is not consistent. Preparation of the board report is done by the college or the district. Approval of certain funding is transmitted to the college either from the funding source or district. There is no guideline on whether the college or district prepares the report for district board approval.	Preparation of the board report and budget is done by the college business office or the district. While most of the approval information is relayed to the district office, some is still routed to the college only. There is no guideline on whether the college or district prepares the report for board approval.	Preparation of the board report is done by the college or the district. While most of the approval information is relayed to the district office, some is still routed only to the college. There is no guideline on whether the college or district prepares the report for district board approval.	Since district-prepared grants are sent directly to the funding source, the approval for funding may be sent directly to the district grants office. Approval for funding for college grants may be transmitted directly to the college. There is no guideline on whether the college or district prepares the report for district board approval.	LACK OF CONSISTENCY IN PROCESSING FOR BOARD APPROVAL 1. All approvals from the funding source should be directed to the district. This information should be reported to the respective college's dean of grants. 2. The district should prepare the reports for board approval. In the case of college grants, this effort should be coordinated with the college dean of grants and Director of Business Services at each college. This method should enable prompt processing for approval and timely start of the project.

Grant Activity	Riverside City College (RCC)	Norco College (Norco)	Moreno Valley College (MVC)	District	Concerns and Considerations
7. Preaward - Preparation of grant staff prior to grant implementation.	While project directors have the necessary background and understanding of the project, they lack the necessary training on managing and reconciling expenditures. There is no formal training for project directors that includes business services staff to improve understanding of the requirements of grant management.	As-needed meetings are held to coordinate efforts between administrative and fiscal staff, but there is no formal training for project directors that include business services staff to improve understanding of the requirements of grant management.	The project director and staff selected to manage the grant prepare to implement the project, but there is no formal training for project directors that includes business services staff to improve understanding of the requirements of grant management.	There is an informal meeting of staff assigned to the project, including the Business Services Department, to discuss best practices. The district conducts casual meetings to discuss grant issues with project directors. There is no formal training for project directors that includes business services staff to improve understanding of the requirements of grant management.	LACK OF FORMAL TRAINING TO EFFECTIVELY MANAGE GRANTS 1. Project directors should undergo a formal training (initiated by the district) that includes proper grant spending, reconciliation of expenditures, and budget modifications. The Business Services Department should be included in this training that explains how to understand, manage and reconcile expenditures. Some districts have prepared a video explaining the proper grant management and addressing pre- and post-awards. 2. District Office Business Services or College Business Services should be included to train project managers on the Galaxy system.

Grant Activity	Riverside City College (RCC)	Norco College (Norco)	Moreno Valley College (MVC)	District	Concerns and Considerations
8. Post-award - Implementing the grant.	At times, the college starts the project even before district board approval to meet the time constraints. The dean of grants initiates the beginning of the project.	The college starts the implementation of the grant as soon as the Grant Notification Letter is received. The dean of grants coordinates this effort with the business office and the director named in the grant. The business office works with the grant director and district to prepare the board report and budget for approval.	The college starts the project only after district board approval. The lead grants officer initiates the commencement of the project.	The dean of grants coordinates with the grant team and discusses the work plan. This is done after the district board approval of the grant. Once the board approves the board resolution, project staff move forward with grant implementation. Grants implemented by a district office are implemented at that level. The project director works with their supervisor and other constituent groups to develop and implement grant activities and achieve grant objectives. The GSP provides assistance informally as needed and requested.	LACK OF CONSISTENCY ON THE TIMING OF IMPLEMENTING GRANTS 1. Implementation of the project should start after district board approval and receipt of the resolution to amend the budget from the county. In the interest of time, earlier action may be taken such as implementation after district board approval only if formally authorized by the district board. 2. The dean of grants should coordinate and keep track of how staff is proceeding with grant implementation.

Grant Activity	Riverside City College (RCC)	Norco College (Norco)	Moreno Valley College (MVC)	District	Concerns and Considerations
9. Post-award - Recording and preparing grant expenditures.	The Business Department develops a detailed grant expenditure report that lists all significant grant information. This report is prepared for all college departments and subsequently forwarded for their information. This report is an Excel spreadsheet that pulls information from the Galaxy system and updates the data with the most current expenditures that have not yet been entered into the Galaxy system.	The Business Services Department analyzes grant expenditures and develops an expenditure report from the Galaxy system and includes related encumbrances that have not yet been recorded in Galaxy. This report is available to the dean of grants, project directors or other departmental officials.	The Business Services Department tracks all expenditures for each grant from the Galaxy system and updates an Excel spreadsheet to track incremental costs and additional information not available in the system.	A monthly expenditure report is prepared listing all grant expenditures pulled from the Galaxy system. As necessary, this report includes information not available in Galaxy.	LACK OF UNDERSTANDING AND COMMUNICATING EXPENDITURES - The Business Services Department for the colleges and the district should adopt a similar monthly report of all grant activities. This report should include the following information: - Grant name - Project manager - Start date - End date - Budget revisions - Indirect costs - Expenses through _____ - Grant balance - Percent expended - Allowable expenses The Galaxy system does not provide all the above information necessitating additional information in Excel worksheets. - There is a strong need to identify grant software to better control financial information electronically. Grant software can also produce a report to be provided to the funding source for their only specific grant.

Grant Activity	Riverside City College (RCC)	Norco College (Norco)	Moreno Valley College (MVC)	District	Concerns and Considerations
10. Post-award - Reviewing expenditures incurred by sub-grantees.	There is no formal method to review expenditures or require an audit of those expenditures.	There is no formal method to review expenditures or require an audit of those expenditures.	There is no formal method to review expenditures or require an audit of those expenditures.	There is no formal method to review expenditures or require an audit of those expenditures.	LACK OF A PROCESS FOR REVIEWING SUBGRANTEE EXPENDITURES 1. All subgrantee expenditures should be reviewed as required. 2. It should be emphasized that the lead grantee is ultimately responsible for the validity of all expenses incurred by the subgrantee.

Grant Activity	Riverside City College (RCC)	Norco College (Norco)	Moreno Valley College (MVC)	District	Concerns and Considerations
11. Post-award - Closing the grant.	The Business Services Department initiates closing the grant based on: • Ending date • Budget having been reached • Information relating to closing There are instances where the district initiates the close. However, there are no written guidelines on how grants are closed.	There are no written guidelines on how grants are closed. The Business Services Department monitors grant expenditures and determines if a grant should be closed in consultation with project directors and the dean of grants.	There are no written guidelines on how grants are closed. The Business Services Department monitors grant expenditures and determines if a grant should be closed in consultation with project directors.	There are no written guidelines on how grants are closed. Informally, the Business Services Department monitors grant expenditures and determines if a grant should be closed in consultation with project directors. However, it is unclear if grant closeout is regularly performed.	LACK OF CONSISTENCY IN CLOSING GRANTS 1. There is a need for written guidelines that define the roles and responsibilities of managing this process. 2. College grants should be closed by the college Business Services Department, with coordination between the District Business Services Office to close the grant in the Galaxy system. 3. A list of closed grants should be prepared by the colleges that includes the following information: • Name of grant • Project director • Starting period • Ending period • Budget amount • Total expenditures This report should be for the fiscal year, be updated quarterly and be provided to the college dean of grants and the Office of GSP.

Grant Activity	Riverside City College (RCC)	Norco College (Norco)	Moreno Valley College (MVC)	District	Concerns and Considerations
12. Post-award - Storage of grant documents.	The Business Services Department creates a folder for the closed grant and loads this in a shared drive that contains: - Financial information - Award documentation - Emails relating to the grant - Notes from the project director Records and documents relating to subgrantees are not always included. There are additional files at the district that need to be obtained because an auditor requires all related information to perform an audit.	The Business Services Department creates a folder that is placed on a shared drive that contains: - Financial information - Award documentation - Emails relating to the grant - Notes provided by the project director Documents relating to subgrantees are not maintained. Grant directors also maintain and safekeep documents required by the funding agency. There are additional files at the district that are kept for internal audit purposes.	The Business Services Department creates a folder that is placed on a shared drive that contains: - Financial information - Award documentation - Emails relating to the grant - Notes provided by the project director Subgrantee records are not maintained. There are additional files at the district that need to be obtained because an auditor requires all related information to perform an audit.	The Business Services Department creates a folder that is placed on a shared drive that contains the following: - Financial information - Award documentation - Emails relating to the grant - Notes provided by the project director Subgrantee records are not maintained. There are additional files to be obtained because an auditor requires all related information to perform an audit.	LACK OF CONSISTENCY IN MAINTAINING DOCUMENTS FOR POST REVIEW 1. All documentation relating to a grant should be consolidated and maintained in one central shared drive. These include the work plan, expenditures and supporting documentation, including documents relating to a subgrantee, maintained at the district and the college.

Workflow and Distribution of Functions for Grant Development and Management

A workflow is a sequential series of tasks necessary for a work project, such as a grant, to pass from initiation to completion in a system. An efficient grant workflow optimizes the movement of grants from the evaluation, approval, funding and implementation stages while minimizing repetitive tasks that could cause delays. The district and its colleges have not adopted a standard grant workflow. While different workflows are used at each college and at the district, they do not provide a clear and efficient path of how grants are processed over their lifespan. Some areas of concern include the following:

- Need for a central coordinator for grant compliance
- Consistency in reviewing and authorizing grants
- Consistency in preparing board of trustee agenda items for authorizing grants
- Starting grant planning efforts prior to receipt of appropriations
- Coordination between project directors and business services accountants in validating expenditures
- Consistency in preparing the status of preaward and post-award grants
- Need for a standard workflow at all three colleges and the district

Each item above will require additional discussions, and solutions will need to be formally adopted as part of the final process.

Other Considerations that Support Grant Development and Management

Coordinated Reporting and Communications

Grant recipients are required to submit regular reports documenting a project throughout its life span. These reports may include financial data (e.g., staff and contractor salaries, equipment purchases, travel expenses, etc.), results and impact of the project, lessons learned, and sustainability plans. Grant reporting and communication in an organization are also vital to support grant development and management. Internal grant reporting involves sharing relevant information to advise all stakeholders on the status of pre- and post-award grants, and to allow staff to evaluate and analyze grant information. During interviews, staff reported communicating internally about grants through various reports prepared for college and district officials; however, these reports are not prepared in a standard format. Clear guidelines for post-award grant expenditure reports should be developed across the district and colleges, and these reports should be submitted monthly by the district or college to the district's Office of GSP. Internal grant reporting and communication in the following areas should be addressed:

Tracking the Status of Preaward Grants

Each college and the district should track the status of preaward grants, including grants considered, selected, and those undergoing review and authorization. Reporting the status of these preaward grants is valuable and should be accomplished using a consistent format. This preaward grant status should be submitted to selected college officials and the district's Office of GSP.

Tracking the Status of Post-Award Grants

The college's business services accountant assigned to a grant is responsible for preparing grant expenditure reports. The district and the colleges should adopt a common post-award grant management data form that includes information not available in the Galaxy system. This post-award grant management data form should be submitted monthly to certain college officials and the district's Office of GSP. The district should also explore acquiring a grants management system to store all grant-related information and eliminate the need for manually prepared supplemental Excel worksheets.

Use of Transmittal Forms

The transmittal form used to route grants from one office to another is designed for contracts, which is not suitable for grants. The district's Office of GSP should create a common grant transmittal form that resembles the contract transmittal form in use, but includes additional information such as the recipient of grants at each step in the grant workflow for review and/or authorization.

Collaboration Between Project Directors and the College Business Services Office

The project director and the business services accountant should collaborate in an ongoing manner to discuss and understand budget expenditures. Project directors should collaborate regularly (e.g., monthly) with the business services accountant assigned to their grant to monitor expenditures and reporting requirements. Currently, the grant expenditure report for the college/district is provided to department officials. Grant expenditures for specific grants should be provided directly to the project directors and followed up with a meeting to discuss any issues and expenditures to date.

Working with Subgrantees

Some grants require the participation of a subgrantee to work on the project under the stipulation of the grant. There are no written guidelines for managing subgrantees. At most, there is a discussion of the work plan and budget participation. It is a federal requirement to manage the status of subawards. Many of the terms and conditions of the lead grantee flow down to the subgrantee. Therefore, one of the lead grantee's responsibilities is to ensure the subgrantee has the capacity to comply with the technical and financial management obligations under the subaward agreement. To maintain an efficient working relationship with a subgrantee, the lead grantee should ensure the following:

- Develop and document procedures for the subgrantee selection process. The process must include steps to validate that their qualifications are consistent with the requirements of the project.
- The subgrantee agreement must be clear and specific about the amount of participation needed to support the work plan.
- The subgrantee budget in the agreement must be within the funding amount and reasonably support the work plan.
- The subgrantee agreement must include a requirement for periodic updates on the project's status and the amounts expended, listing the dates the updates will be required.
- The subgrantee agreement must include a requirement that all related information be turned over to the district's Office of GSP at the conclusion of the project.
- The subgrantee agreement must include a requirement for a list of expenditures and, if requested, copies of related documentation for validation.

Grant Closure

When a grant ends, the district and college should work together and follow the closeout process required by the grant's funding source. During interviews, staff indicated grant closing documents are not stored in a central location. The district's Office of GSP should house all district and college grant closure documents in a centrally shared file so they can be easily accessed by auditors, and district and college staff. In addition, the district's Office of GSP should be responsible for coordinating, developing and presenting the outcomes of the grant. At a minimum, this presentation should equal the effort of the presentation delivered when the grant was awarded.

Assessment

Upon the closure of a specific grant, district and college staff should meet to assess the grant, the process, challenges and successes to determine lessons learned to continually improve the process and workflow of grants.

Trending the Impact of Grants

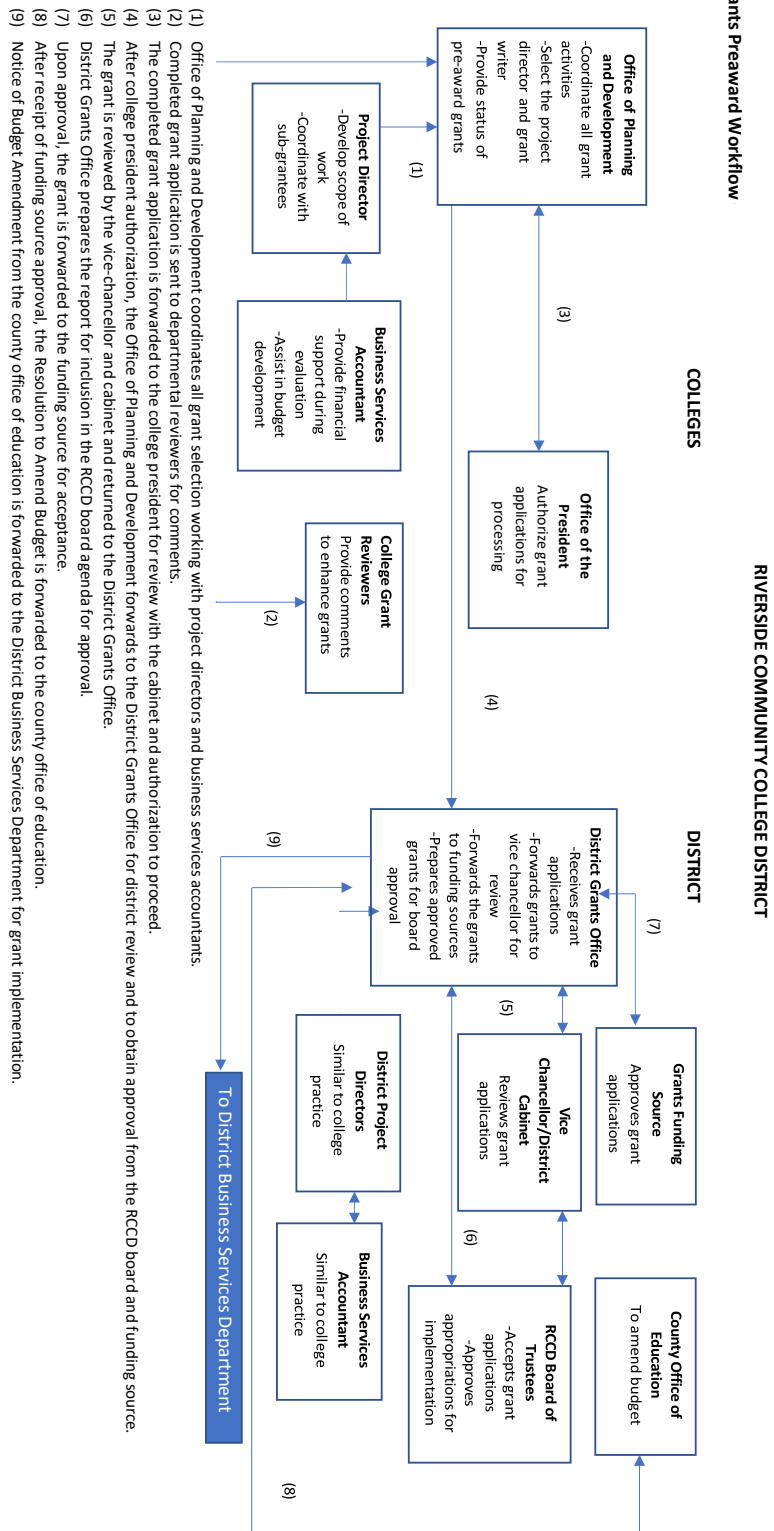
As grants increase, there may be an impact on existing resources such as procurement and human resources. District staff should trend grant-related workload activities in existing departments such as Human Resources, Procurement and any other affected areas to better understand the impact and plan for any future district personnel needs in those departments.

Grants Workflows

Upon review and analysis of the current practices, documented concerns and potential solutions to address these concerns, FCMAT drafted proposed workflows for pre- and post-award of grants.

Preward Workflow

Grants Preaward Workflow



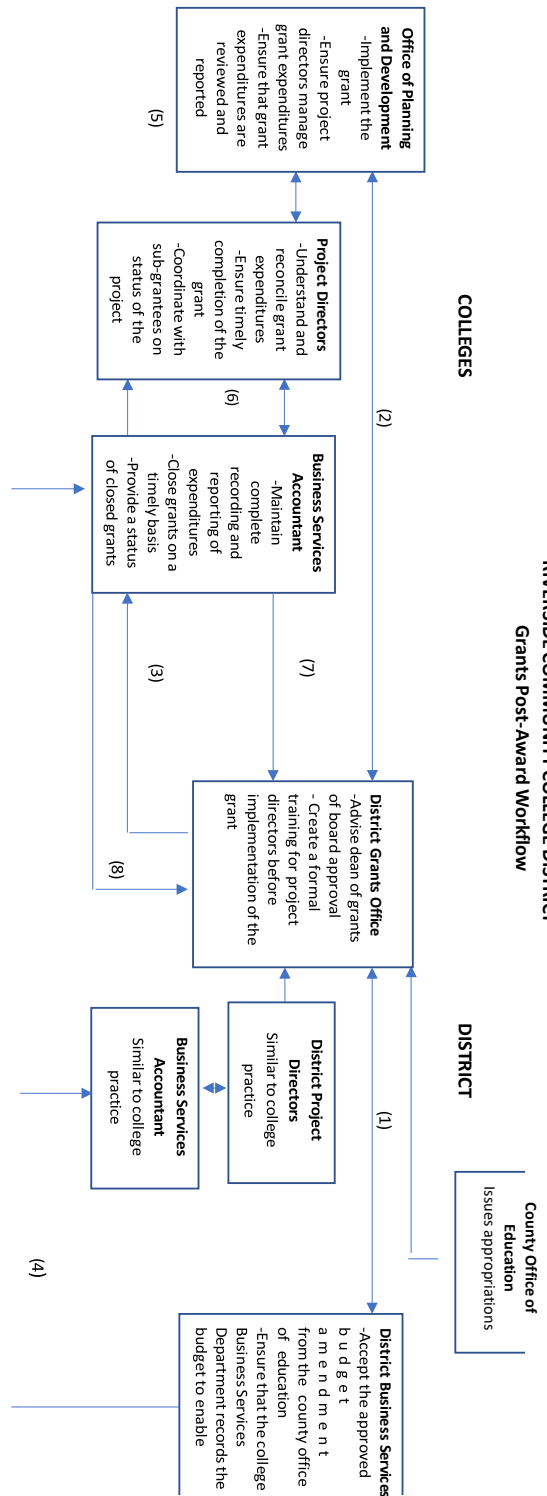
May 13, 2022

1. The college will first determine whether a grant will support students, and that the program and outcomes are aligned with the strategic goals of the institution. To support an inclusive and participatory structure, the college's dean of grants should assemble an ad hoc committee to evaluate grant opportunities and decide whether to pursue those that come before them. The award grant workflow begins with the college's Office of Planning and Development. This department is responsible for coordination of all grant activities of the college. All potential grants should be referred to and coordinated by the college's dean of grants. Even in the evaluation stage, the college's Business Services Department should participate to provide unforeseen cost information and the total cost of ownership. Upon approval by the college president to move forward, a potential project director should be identified and available to expedite development of the work plan if a grant is selected. For each grant, the college will select a project director and a grant writer. If a grant requires any subgrantees, the project director will coordinate the agreement to include deliverables, outcomes, and any other terms in the subgrantee agreement. The project director will work with the business services accountant on financial evaluation and fiscal coordination and development of the budget for the grant application.
2. Once the grant application is drafted, it will be forwarded to a college grant reviewer(s) who will review and provide feedback to make the grant as competitive as possible.
3. A final draft of the grant application is then forwarded to the college's president's office for review, approval and authorization by the cabinet to proceed for processing.
4. Upon approval by the president, the college's Office of Planning and Development will forward the grant application to the district's Office of GSP for compliance review. Grants are different from contracts that require college approval only up to a certain limit. Instead, the district board approves all grants regardless of amount. The district's Office of GSP will prepare the grant for review and processing for authorization by the district board. As necessary, this effort should be coordinated with the college's dean of grants. This method should allow prompt commencement of the project and inclusion on the board agenda.
5. The district's Office of GSP will receive the grant application from the college's Office of the President and will forward to the vice chancellor for review. The district's Office of GSP will review the grant application's work plan. If the grant has a subgrantee, the district project director will review the agreement. The district's Office of GSP will work with the district business services accountant to review financial information and budget for the grant.
6. The vice chancellor and district cabinet will receive grant application information. Once reviewed, it will be returned to the district's Office of GSP for inclusion on the board agenda.
7. A board agenda item for the grant will be prepared requesting board authorization. When the grant is submitted to the district board for authorization to proceed with submission, it may be important to secure authorization for any other approvals once a funding notice from the funding source is received. This could include recruitment approval for positions, authorization to temporarily utilize alternative funding, etc., so that the program and support for the colleges may continue during the funding and board approval stage.
8. Upon authorization by the district board, the district's Office of GSP will submit the grant to the funding source for approval.

9. After receiving approval from the funding agency, the district's Office of GSP and district Business Services Department will assign a budget string to the grant and prepare the budget document for district board approval of the appropriation. In certain cases, grant funding letters go to the colleges instead of the district. On those rare occasions, the college must forward the funding letter to the district's Office of GSP as soon as possible so the district board agenda item can be developed and submitted for approval.

Post-Award Workflow

RIVERSIDE COMMUNITY COLLEGE DISTRICT Grants Post-Award Workflow



- (1) Budget Amendments from the county office of education are communicated by the District Grants Office to the district Business Services Department.
- (2) Approval of appropriations is communicated to the Office of Planning and Development.
- (3) A formal training program is scheduled for project directors and business services accountants.
- (4) College business services accountants coordinate with district Business Services Department to ensure that funds had been transferred to the grant budget to enable spending.
- (5) Begin grant implementation. Grants should not commence until RCCD approval and receipt of Budget Amendment.
- (6) Close coordination between the project directors and business services accountants to understand the nature of spending. This is an area of difficulty.
- (7) A monthly grant expenditure report, prepared by the business services accountants should contain all relevant information and provided to interested parties.
- (8) As grants are closed, a report should be available and all related documentation maintained at the District Grants Office.

1. The district's Business Services Department will prepare a board agenda item and budget resolution requesting approval to include appropriations in the budget. Upon district board approval of the resolution, the district Business Services Department staff will forward the resolution to the county office of education and ensure the college Business Services Department staff are aware of the appropriate budget and coding to enable execution of the grant expenditures.
2. The district's Office of GSP will communicate to the college's Office of Planning and Development when appropriations have been received.
3. The district's Office of GSP will require a formal training for the project directors. The training will be created by district's Office of GSP prior to the implementation of the grant. This training session will include project directors and business services accountants and will provide information on grant outcomes, expenditures, subagreements (if any), budgets, and reporting.
4. The college and district Business Services Department staff will coordinate to ensure the budget has been posted and grant spending can commence.
5. The grant is now ready for implementation. Expenditures should comply with all approvals and processes that have been ratified prior to the implementation (i.e., board approval to proceed, etc.)
6. The project directors and business services accountants will regularly coordinate. The project director needs to coordinate efforts with college's Business Services Department and regularly obtain the latest list of expenditures charged to the grant. All charges should be reviewed and validated. In addition, all periodic reports, including closing reports, should be reviewed by all appropriate and authorized parties prior to submission. If the grant has subgrantees, coordination will be necessary prior to completion of reports.
7. Monthly grant expenditure reports should be prepared by the college's business services accountants and forwarded to the project director, college administration and district's grants and Business Services Department staff.
8. College grants should be closed by the college's Business Services Department. Upon closing of a grant, all relevant reports and grant documentation should be forwarded to the district's Office of GSP where it will be maintained.

During the development of district and college roles and responsibilities, each step above should be reviewed in detail to ensure all strategic goals are met.

Recommendations

The district should:

1. Adopt a preaward and post-award grant workflow that focuses on efficiency in developing and managing all grants. The workflow should address the following:
 - Fiscal compliance
 - College autonomy and innovation
 - Timely coordination of all grant-related activities at the colleges and the district

- Thorough review and authorization of grant applications
 - Processing and district board authorization and approval of grant applications and awards
 - Obtaining county office of education budget amendments
 - Managing the work plan and constant review of grant expenditures
 - Closing the grant and document storage
2. Once the grant workflow is adopted and institutionalized, conduct a workshop with deans of grants, grant managers and business office staff responsible for grant management with the goal of developing a model workflow for pre- and post-award grants. The models should be adopted districtwide prior to identifying roles and responsibilities. During this process, staffing needs should be identified. Throughout the development of district and college roles and responsibilities, each step of the preaward and post-award grant workflows should be reviewed in detail to ensure all strategic goals are met.
 3. Develop a common preaward grant status form for the colleges and district to use to track the status of preaward grants, which should be submitted to and maintained by the district's Office of GSP.
 4. Develop a common post-award grant management data form with grant information including the grant's administrator, start date, ending date, indirect costs, and allowable expenses, etc., which should be submitted to and maintained by the district's Office of GSP monthly.
 5. Identify and acquire technology (software and/or hardware) to support grant coordination, development and management districtwide.
 6. Develop a training program for all grant-related personnel with a focus on forms, workflow, and roles and responsibilities.
 7. Trend grant-related workload activities in areas such as human resources and procurement to better understand the impact of grants and to plan for future district personnel needs in those departments as activity increases or decreases over time.
 8. Ensure that the project directors at the colleges collaborate regularly with the business services accountant assigned to their grant to monitor expenditures and reporting requirements.
 9. Prepare written guidelines for managing subgrantees to ensure that they have the capacity to comply with the technical and financial management obligations under subaward agreements.
 10. Ensure all college and district grant closeout documents are in the central shared file at the district's Office of GSP.
 11. Coordinate, develop and present the outcomes of the grant at the district's Office of GSP. At a minimum, this presentation should equal the effort of the presentation delivered when the grant was awarded.

12. Perform an overall assessment at the conclusion of each grant by district and college staff to identify lessons learned, improvements, etc. This is necessary to continually improve and strengthen processes to support students, programs, and support the institution's strategic plans.

Appendix

Study Agreement



**FISCAL CRISIS & MANAGEMENT ASSISTANCE TEAM
STUDY AGREEMENT
October 27, 2021**

The Fiscal Crisis and Management Assistance Team (FCMAT), hereinafter referred to as the team, and Riverside Community College District (RCCD), hereinafter referred to as the district, mutually agree as follows:

1. BASIS OF AGREEMENT

The team provides a variety of services to local educational agencies (LEAs). The district has requested that the team provide for the assignment of professionals to study specific aspects of the Riverside Community College District operations, based on the provisions of Education Code (EC) Section 84041. These professionals may include staff of the team, county offices of education, the California Department of Education, school districts, charter schools, community colleges, or private contractors. All work shall be performed in accordance with the terms and conditions of this agreement.

2. SCOPE OF THE WORK

A. Scope and Objectives of the Study

The scope and objectives of this study are to:

Prepare an analysis of the district's and college's policies, procedures, and practices, including structure and programming, in place to support effective grant development, submission and management, and to recommend improved efficiencies, more effective processes and practices, and clarification of roles, responsibilities and decision making, as necessary. Specifically, the team will perform the following::

- 1) Review and analyze operational processes and procedures that support grant development and management between and among the colleges and district office, including but not limited to business procedures, grants department, and human resources, and make recommendations for improved efficiency, clarity of roles, responsibilities, and decision making, if any. Ensure the who, what, where, why, when and how aspects of relevant processes are identified (or perhaps established) and understood (e.g., process mapping).
- 2) Evaluate the current workflow and distribution of functions for grant development and management, and make recommendations for improvements, if any.
- 3) Identify resources necessary to carry out an effective grants process based on FCMAT's recommendations.

B. Services and Products to be Provided

- 1) Orientation Meeting – The team will conduct an orientation session at the district to brief college management and supervisory personnel on the team’s procedures and on the purpose and schedule of the study.
- 2) On-site Review and Interviews – The team will conduct on-site reviews and interview personnel at the district office and colleges as necessary.
- 3) Draft Report – Electronic copies of a preliminary draft report of findings and recommendations will be delivered to the district’s administration for review and comment.
4. Final Report – Electronic copies of the final report will be delivered to the district’s administration following completion of the review. The final report will be published on the FCMAT website.

3. PROJECT PERSONNEL

The FCMAT study team may include:

- | | | |
|----|--------------------------------|------------------------------------|
| A. | Michelle Giacomini | Deputy Executive Officer, FCMAT |
| B. | Carolynne Beano | Intervention Specialist, FCMAT |
| B. | Cambridge West Partnership LLC | FCMAT Community College Consultant |

4. PROJECT COSTS

The cost for the study requested pursuant to EC 42127.8(d)(1) shall be:

- A. \$1,100 per day for each FCMAT staff member while on site, conducting fieldwork at other locations, preparing or presenting reports, or participating in meetings. The cost of independent consultants will be billed at the actual daily rate for all work performed based on the provisions of EC 84041
- B. All out-of-pocket expenses, including travel, meals, lodging, etc. The district will be invoiced at actual costs, with 50% of the estimated cost due following the completion of the on-site review and the remaining amount due upon acceptance of the final report by the district.

Based on the elements noted in section 2A, the total not-to-exceed cost of the study is \$80,000.00.

- C. Any change to the scope will affect the estimate of total cost.

Payments for FCMAT's services are payable to Kern County Superintendent of Schools - Administrative Agent, located on 1300 17th Street, City Centre, Bakersfield, CA 93301.

5. RESPONSIBILITIES OF THE DISTRICT

- A. The district will provide office and conference room space while on-site reviews are in progress.
- B. The district will provide the following (if requested):
- 1) Policies, regulations and prior reports addressing the study request
 - 2) Current or proposed organizational charts
 - 3) Current and two prior years' audit reports
 - 4) Any documents requested on a supplemental list
 - 5) Any documents requested on the supplemental list should be provided to FCMAT in electronic format; if only hard copies are available, they should be scanned by the district and sent to FCMAT in an electronic format.
 - 6) All documents should be provided in advance of fieldwork; any delay in the receipt of the requested documentation may affect the start date and/or completion date of the project. Upon approval of the signed study agreement, access will be provided to FCMAT's SharePoint document repository and all requested documents shall be uploaded by the district.
- C. The district administration will review a draft copy of the report resulting from the study. Any comments regarding the accuracy of the data presented in the report or the practicability of the recommendations will be reviewed with the team prior to completion of the final report. The final report will be published on the FCMAT website.

6. PROJECT SCHEDULE

The following schedule outlines the planned completion dates for key study milestones and will be established upon the receipt of a signed study agreement:

<i>Study Agreement Effective Date:</i>	<i>To be determined</i>
<i>Orientation:</i>	<i>To be determined</i>
<i>Staff Interviews:</i>	<i>To be determined</i>
<i>Draft Report Submitted:</i>	<i>To be determined</i>
<i>Final Report Submitted:</i>	<i>To be determined</i>
<i>Study Agreement End Date:</i>	<i>June 30, 2022</i>

7. COMMENCEMENT, TERMINATION AND COMPLETION OF WORK

FCMAT will begin work as soon as it has assembled an available and appropriate study team consisting of FCMAT staff and independent consultants, taking into consideration other jobs FCMAT has previously undertaken and assignments from the state. The team will work expeditiously to complete its work and deliver its report, subject to the cooperation of the district and any other parties from which, in the team's judgment, it must obtain information. Once the team has completed its fieldwork, it will prepare a draft report and a final report. Prior to completion of fieldwork, the district may terminate its request for service and will be responsible for all costs incurred by FCMAT to the date of termination under Section 4 (Project Costs). If the district does not provide written notice of termination prior to completion of fieldwork, the team will complete its work and deliver its report. The district will be responsible for the full costs. The district understands and agrees that FCMAT is a state agency and all FCMAT reports are published on the FCMAT website and made available to interested parties in state government. In the absence of extraordinary circumstances, FCMAT will not withhold preparation, publication and distribution of a report once fieldwork has been completed, and the district shall not request that it do so.

8. INDEPENDENT CONTRACTOR

FCMAT is an independent contractor and is not an employee or engaged in any manner with the district. The manner in which FCMAT's services are rendered shall be within its sole control and discretion. FCMAT representatives are not authorized to speak for, represent, or obligate the district in any manner without prior express written authorization from an officer of the district.

9. INSURANCE

During the term of this agreement, FCMAT shall maintain liability insurance of not less than \$1 million unless otherwise agreed upon in writing by the district, automobile liability insurance in the amount required under California state law, and workers' compensation as required under California state law. FCMAT shall provide certificates of insurance, with Riverside Community College District named as additional insured, indicating applicable insurance coverages upon request.

10. HOLD HARMLESS

FCMAT shall hold the district, its board, officers, agents and employees harmless from all suits, claims and liabilities resulting from negligent acts or omissions of its board, officers, agents and employees undertaken under this agreement. Conversely, the district shall hold FCMAT, its board, officers, agents and employees harmless from all suits, claims and liabilities resulting from negligent acts or omissions of its board, officers, agents and employees undertaken under this agreement.

11. COVID-19 PANDEMIC

Because of the existence of COVID-19 and the resulting shelter-in-place recommendations, local educational agency closures and other related considerations, at FCMAT's sole discretion, the Scope of Work, Project Costs, Responsibilities of District (Sections 1, 4 and 5 herein) and other provisions herein may be revised. Examples of such revisions may include, but not be limited to, the following:

- A. Orientation and exit meetings, interviews and other information-gathering activities may be conducted remotely via telephone, video conferencing, etc. References to site work and fieldwork shall be interpreted appropriately given the circumstances.
- B. Activities performed remotely that are normally performed in the field shall be billed hourly as if performed in the field (excluding out-of-pocket costs).
- C. The district may be relieved of its duty to provide conference and other work area facilities for the team.

12. FORCE MAJEURE

Neither party will be liable for any failure of or delay in the performance of this study agreement due to causes beyond the reasonable control of the party, except for payment obligations by the district.

13. CONTACT PERSON

Name: Rebecca Goldware, Vice Chancellor
Institutional Advancement & Economic Development
Telephone: (951) 222-8111
E-mail: Rebecca.Goldware@rccd.edu



11/16/2021

Aaron Brown
Vice Chancellor, Business & Financial Services
Riverside Community College District

Date



11/17/21

Michael H. Fine
Chief Executive Officer
Fiscal Crisis and Management Assistance Team

Date