Guidelines for Classification of Sponsored Projects and Gifts
Rocky Mountain College Grants Office

These guidelines describe standards to be used to classify external support and identify appropriate administrative procedures for accepting and processing such support. For purposes of these guidelines, “External support” is anything of economic value provided by a third party (either the “sponsor” in the case of sponsored projects or the “donor” in the case of gifts) for use in a project conducted by or at Rocky Mountain College (RMC).

Correct classification of external support and use of appropriate procedures is intended to assure RMC’s ability to: (i) comply with requirements specified by the sponsor or donor; (ii) satisfy audit reporting requirements; (iii) properly recover its costs, both direct and indirect; (iv) monitor the nature and extent of sponsored project activity; and (v) assure compliance with applicable laws, regulations and RMC policies.

The distinction between a grant and a gift is not always a clear one, but they are usually defined in terms of deliverables. Gifts are normally given without expectation of return. Grants and contracts, on the other hand, involve a quid pro quo: some service is rendered in exchange for the money.

Another distinction has to do with the taxability of the transaction. As a general rule, both grants and gifts are deductible as charitable contributions or business expenses, but any profits made as a result of the transaction are taxable.

The following guidelines are to be used in determining the classification of external support by all RMC personnel.

I. General Guideline
All sponsored projects shall be acknowledged and tracked by the Grants Office, and all gifts shall be acknowledged and tracked by the Development Office. The Director of Grants is the authorized contact for grants and contracts on behalf of RMC, while the Vice President of Development is the authorized contact for gifts.

II. Sponsored Projects
For purposes of these guidelines, a “sponsored project” is any project receiving external support (including research, scholarly work, training, workshops, and services) that has defined performance requirements.

The following criteria shall be used for classifying sponsored projects:
A. **Governmental External Support.** A project receiving either direct or indirect external support from any federal, state, local, foreign, or other governmental entity shall be considered a sponsored project at the time the support is committed or paid.

B. **Non-Governmental External Support.** A project receiving external support from a non-governmental entity shall be considered a sponsored project if the project is subject to any of the following conditions at the time the support is committed or paid:

1. The project involves any of the following: human subjects, vertebrate animals, radioactive materials, recombinant DNA, human body substances, infectious agents, or third-party proprietary materials.

2. The external support is subject to any of the following conditions:
   a. Delivery of specific goods, services, or other deliverables by RMC;
   b. Performance milestones;
   c. Transfer of intellectual property, ownership, or related rights;
   d. Insurance, indemnification, or warranty;
   e. Restrictions on publication of research results; or
   f. Audit requirements.

3. The provider of the external support may withhold or seek a refund of the support if the project fails to meet performance requirements or project objectives, including certain research outcomes.

4. External support is provided for research-related patient care services or the routine cost of care delivered as part of research studies.

5. External support is provided by a sponsor for the testing or assessment of the sponsor’s products or services.

### III. Gifts

For purposes of these guidelines, a gift is the voluntary provision of external support by a donor to RMC without any requirement for receipt of any economic or other tangible benefit in return.

Gifts shall normally meet the following criteria:

A. The external support does not meet the criteria for a sponsored project as described in Section II of these Guidelines.

B. The external support is irrevocable, providing the gift is used in accordance with any valid restrictions accepted by RMC.

C. No goods, services or deliverables are offered or exchanged in consideration of receipt of the external support.
D. The donor provides the support to RMC without expectation of direct economic benefit or other tangible benefit. Indirect benefits such as tax advantages or business or personal goodwill derived from close association with RMC and the miscellaneous benefits derived from donor status do not negate gift intent.

E. Financial reporting or accounting for use of external support is not required, although it shall be acceptable for the donor to request information from RMC about use and/or impact of the external support, including expenditures and fund balances.

Contributions to endowments and nongovernmental contributions for capital projects would normally be classified as gifts.

The standards described in these guidelines are applicable to all external support provided to RMC. Final determination of all questions arising under these guidelines relating to the classification and processing of external support shall be made by the Chief Financial Officer in collaboration with the Vice President of Development.
Fiscal Responsibilities for Sponsored Projects
Rocky Mountain College Grants Office

This document describes Rocky Mountain College (RMC) policy for fiscal responsibilities on sponsored projects.

Grants and contracts are awarded to RMC, not to individual investigators or departments. Acceptance of a grant or contract by RMC signifies RMC’s willingness to assume responsibility for the administration of the funds in accordance with the terms specified by the awarding agency.

This responsibility is shared within the institution by the investigator, his or her supervisor, the Grants Office and the Business Office. All work to see that the terms of the award are observed and that expenditures during a given period are not in excess of funds awarded.

Each person’s role is as follows:

A. Principal Investigator
   1. Develops an over-all plan for the commitment of grant and contract funds, working with his or her supervisor and consulting other RMC officers as appropriate.
   2. Initiates expenditures to be charged against the grant or contract account.
   3. Supervises expenditure of grant or contract funds to ensure
      a. Funds are used only for purposes directly related to the activity supported.
      b. Expenditures are consistent with all special terms, conditions, or limitations that apply to expenditures under the particular grant or contract.
      c. Expenditures do not exceed the total funds authorized for a given period under the grant or contract. In many cases the grant or contract may also specify expenditure limits by budget category or line item.
   4. Assumes accountability for deficits or disallowances that occur under a grant or contract account.

B. Supervisor
   1. Establishes systematic procedures for supervision of grant and contract accounts.
   2. Provides reasonable coordinated administrative support for the management of grant or contract accounts.
   3. Consults with principal investigator concerning the resolution of a deficits or disallowances incurred on a grant or contract account and fix responsibility for settling the problem quickly.
C. Grants Office
   1. Provides principal investigator with information about any special terms, conditions, or limitations that apply to each grant or contract account.
   2. Monitors financial administrative tasks for sponsored projects to ensure they are completed in a timely manner;
   3. Consults on specific questions about the propriety of a given expenditure, on budget monitoring techniques, and on other such matters.
   4. Monitors grant-related transactions on a sampling basis to assure consistency with sponsor and RMC policies.

D. Business Office
   1. Reviews and approves proposal budgets to ensure compliance with RMC fiscal priorities and constraints;
   2. Assigns account numbers according to standard RMC financial management procedures and approves expenditures if expenses fit budgeted categories. No other review.
   3. Handles all financial transactions related to the project, including cash drawdowns, deposits and disbursements per the requirements of 2 CFR 200.305.
   4. Reviews sponsored project expenditures ONLY to ensure they are booked to appropriate cost categories;
   5. Provides principal investigator with detailed monthly report of grant or contract expenditures and encumbrances.
   6. Consults on specific questions about the propriety of a given expenditure, on budget monitoring techniques, and on other such matters.
   7. Prepares and submits all financial reports required by the sponsor;
   8. Coordinates all audits performed by RMC’s independent auditors, federal agencies, and other sponsoring agencies
   9. Prepares and negotiates the federal indirect cost rates and fringe benefit rates
   10. Keeps copies of all financial aspects of grants, including subawards.

If a deficit or disallowance occurs under a grant or contract account, the principal investigator, in consultation with the supervisor, is to advise the Grant and Business Offices as to the appropriate disposition. RMC does not budget funds for covering grant or contract deficits or disallowances so alternative sources must be found by the principal investigator. In the absence of specific advice, the Business Office will charge the departmental budget.

Questions relating to accounting matters, or requests for assistance in the establishment of record-keeping systems for monitoring grant and contract expenditures, should be directed to the Business Office.

February, 2008
Grant Proposal Development Worksheet
Rocky Mountain College Grants Office

Project Director: ____________________________
Department: ________________________________
Who will author proposal? ______________________
Have you discussed this Project with your Department/Division? Yes ______ No ______

Brief description of the project for which you are seeking funding (see next page for guidelines):

Brief description of your academic program (see next page for guidelines):

Budget
Provide an estimated project cost. If multi-year project, provide estimated annual amounts as well.
Total Project Cost: __________________Number of Years for Project: ________________
Average Annual Costs: ________________

Potential Funding Sources:

Will project require funding beyond expected grant period? Yes ______ No ______
If so, how do you plan to fund the program beyond the expected grant period?

________________________________________

Date received by Grants Department: __________________________

February 2008
RMC Grant Proposal Development Worksheet

**Purpose:** This Grant Proposal Development Worksheet serves two purposes:
1. Give the Department of Grants sufficient information to effectively seek funding sources for your project.
2. Guide you in articulating your project and laying the basis for your grant application.

For assistance in completing the form, please call the Department of Grants (657-1110) to schedule a consultation. The Department of Grants will begin a search for potential funding sources for your project when we receive the project description and estimated budget for the project.

**Project Description Guidelines**
1. Please provide a brief project description, including the following:
2. Project goal(s) - What do you want to accomplish with this project? What problem or need does the project address?
3. Methodology and evaluation - How will you address the problem/need? How will you know you've succeeded?
4. Number of students/faculty impacted, benefits to the students.
5. Percentage (%) of your time that will be required to do this project.
6. History and/or experience relevant to this project (e.g. prior planning, related teaching or research projects, community activities, and other grants).

**Academic Program Description Guidelines**
Please provide a general description of your academic program, including the following:
1. Area of study (e.g. biology, anthropology) and areas of emphasis in program (e.g. health science, evolution/ecology).
2. Total number of students taught each year and number of students in each area of emphasis, if applicable.
3. Essential knowledge and skills your program gives to your students, how it prepares them for post-college careers, etc.
4. Program goals: Future plans, why, who will benefit.
5. Your professional development goals: What you'd like to do in the future, and why, and who will benefit.
6. Past program accomplishments, such as collaborations with other schools, community groups or industry; performances; exhibits; awards; study abroad; and prior grants.
7. Other faculty involved in this project.

**Budget Guidelines**
1. Please provide an estimated budget for your total project, as well as annual estimates for multi-year projects. A detailed budget is not necessary at this stage, but when estimating your budget, consider the following:
2. Percentage of your salary, if any, to be paid by grant.
3. Salary or stipends for additional personnel.
4. Equipment needs.
5. Supply needs.
6. Facilities costs.
7. Services, including outside contractors or consultants.
8. Travel costs.
9. Publication/Publicity costs.
10. Any student costs, such as stipends, uniforms, lodging, dues, conference registrations, etc.

A major issue for many grant-funded projects is sustainability. If your project will extend beyond the expected grant period (usually 1 to 5 years), you must have a viable plan for sustainability in order to receive funding.

Also, please list any potential grant sources you've already identified. Also list any professional organizations you are involved in, that may have an interest in your project, etc.
Notification of Intent to Apply for Funding

Completing this form indicates that you are interested in pursuing a specific funding opportunity and request College support in the application process.

Name of Project Director ________________________________

Department ________________________________

Who will author proposal? ________________________________

Have you discussed this Project with your Department/ Division?  _____Yes ______No

Funding Opportunity

Name of Funding Organization ________________________________

Name of Proposed Project ________________________________

Amount Requested ________________________________

RMC Match Required, if any ________________________________

Proposal Due Date ________________________________

For Rocky to sponsor and support a search for funding for the above project the respective departments/division must be notified. Furthermore, written approval is required from the appropriate Vice President and from the Budget Office.

I acknowledge that notification of intent to pursue a specific funding opportunity as outlined above was given:

Grants Dept.

______________________________

Div/Dept. Chair

______________________________
Authorization Required

Budget Office

Vice President

Note -- Without prior notification of an intent to apply for funds, the College reserves the right not accept or administer any awards.

Information: (1) It is expected that certain information may change as the project evolves, such as the title and budget amount. It is not necessary to complete a new form indicating any changes. (2) If your notification is disapproved, you will be informed of the reasons in writing. The following options are available to you: alter your project to address the reasons it was disapproved and submit a new notification form; ask for reconsideration of the original form in writing explaining why you disagree with the disapproval; contact the Grants Department for suggestions of alternate funding sources; devise a new project. (3) A notification form may be disapproved for a number of reasons, including but not limited to the following: Conflicts with the guidelines of the funding organization, a pre-existing application or strategy for a particular funding organization, college policy and/or strategic plan differences, matching fund or time commitment constraints.

The Budget office must first review and approve any budget that requires matching funds prior to the submittal of an application.
ROCKY MOUNTAIN COLLEGE

TIME AND EFFORT REPORT

Name: 

Department: Phone: 

Academic Period Reporting: 

(If grant period covers less time than an academic semester, list start and end dates for the period this report is covering)

<table>
<thead>
<tr>
<th>Activity</th>
<th>Grant Number</th>
<th>Grant Name</th>
<th>Distribution of Time</th>
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<td><strong>Grants</strong></td>
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<td>Grant 1</td>
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<td>Grant 2</td>
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<td><strong>Teaching</strong></td>
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<td><strong>Administrative</strong></td>
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<td><strong>Fundraising</strong></td>
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<td><strong>Leave</strong></td>
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<td>Sick</td>
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<td>Vacation/annual</td>
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<td>Other (Specify)</td>
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<td>%</td>
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</tbody>
</table>

Total: 100 %
To the best of my knowledge, the above is a true statement of the percentage of effort given in each category.

Employee’s Signature  
Date:  

Supervisor’s Signature  
Date:  
I. PURPOSE

The College recognizes that employees may be required to travel while conducting College business. College employees are eligible for reimbursement of necessary and appropriate travel expenses incurred during authorized travel. The College’s travel policy and procedures follow the IRS Standards for an “Accountable Plan” which requires that each expense be substantiated with proper documentation.

II. POLICY

BEFORE TRAVEL

1. When planning your travel, please obtain appropriate travel approval from your supervisor.

2. The Business Office will pay expenses prior to your trip as follows:
   a. For direct payment to a vendor for travel expenses such as conference fees, hotel deposits and airline tickets:
      Submit an approved purchase order or check request form to the Business Office, with the externally generated supporting documents attached. Note in the Special Instructions box on the purchase order that a check is needed.

   b. To request a travel advance, submit an approved Travel Advance form to the Business Office at least seven (7) business days prior to the date you need the funds. Travel advances for reasonable amounts are available for employees who are not authorized to have an RMC credit card.

   c. To get reimbursed for any allowable travel expenses you paid personally in advance, file an Expense Report with original receipts attached.

TRAVEL ADVANCE

A travel advance is the College’s means to provide an employee with funds to pay for approved travel expenses in advance of travel.

Requests for travel advances are made by filling out the Travel Advance Request Form.
This form is available on the Business Office webpage. Requests must be submitted as early as possible prior to travel and at least seven (7) business days prior to departure.

Travel advance policies:
1. The travel advance amount may be up to the anticipated total cost of travel less any prepaid expenses, or expenses covered by a purchase order.
2. Travel advances may be issued only to active College employees.
3. Employees who have an RMC credit card should use it for expenses during the trip. A modest travel advance may be issued for items not easily paid by credit card.
4. Travel advances will not be issued to an employee who has a travel advance outstanding.
5. Within ten (10) business days of the end of travel, the employee must submit an itemized accounting of travel funds on an Expense Report form.
   • If travel expenses exceed the travel advance, a College check will be issued payable to the employee.
   • If travel expenses are less than the amount of the travel advance, bring the unspent amount to the Business Office upon your return. Attach the receipt for the repayment, along with your original expense receipts, to your expense report.
6. If a travel advance is not settled timely, the full amount received from the College will be deducted from the employee’s paycheck.

ALLOWABLE TRAVEL COSTS

1. TRANSPORTATION – An employee will be reimbursed for actual costs incurred for the most direct and economical means of transportation to and from the destination(s). No reimbursement will be made for tickets purchased with frequent flyer miles or personal flight/travel credits.

2. AUTOMOBILE EXPENSE
   a. When using any vehicle, whether privately owned or owned or leased by the College, for College business, the employee must have a valid driver’s license, carry automobile liability insurance, and be an authorized driver (see c. below).

   When renting a vehicle, it is mandatory that the extra liability coverage on the vehicle, also called loss/damage waiver, be purchased. Failure to purchase the additional insurance may leave the renter and/or the College open to massive charges in case of damage to the rented vehicle.
b. **Personal vehicle use:** The College will reimburse employees for personal vehicle mileage at the College’s approved mileage rate (currently $.40 per mile). Out-of-state mileage reimbursement will be limited to the lesser of actual miles driven or comparable airfare (coach/economy class). Employees will **not** be reimbursed for gasoline purchases when using a personal vehicle.

c. **Authorized driver list:** Anyone driving any vehicle for RMC business must be included on the authorized driver list. To do this, submit a completed copy of the Motor Vehicle Report Release Form, available on the Human Resources web page at rocky.edu, to the Human Resources office. Allow at least a few days before your first planned trip for processing time.

3. **LODGING**
   a. Before your trip:
      * find out if the hotel/motel will take a purchase order; if so, submit one.
      * call the Business Office (1013) to see if we can get the sales tax waived in your destination state.

   b. An employee will be reimbursed for lodging when overnight travel for College purposes exceeds 50 miles from the employee’s normal place of work.

   c. Lodging expenses should be the least costly available while providing for the safety and comfort of the traveler. When attending a conference, employees are required to stay either in the designated hotel with which the conference has negotiated a reduced lodging rate, or in a nearby hotel where the rate is comparable to or lower than the rate of the designated hotel.

   d. The original lodging receipt showing the establishment’s name, street address, telephone number, the actual dates of lodging, and the daily room charges is required for reimbursement.

4. **MEALS** – An employee uses one of the following two methods when requesting reimbursement for expenses for meals: Travelers may not combine the “actual costs” and the “per diem” method on any single trip; that is, choose **one method only** for each overnight trip.

   a. **Actual Costs:** The employee is required to submit original detailed receipts that itemize expenses for meals consumed (a credit card receipt showing only the total amount or a monthly statement is not adequate). The actual costs of meals must be reasonable. Tips are not to exceed 20%. If persons other than employees are included in the meal, their names and the business purpose must also be included on the expense report.

   b. **Per Diem Meal Rate:** The per diem meal rate is a flat-rate allowance (currently $39.00 per day). Under the per diem meal rate, the employee is not required to provide receipts to substantiate the cost of the meals.
c. Partial Day Per Diem Rates: breakfast $8, lunch $12, dinner $19.

Per diem is available only for trips with an overnight stay. For a day trip, submit actual meal receipts for reimbursement.

The employee cannot claim per diem for meals that are purchased by others (e.g., conference meals and vendor-sponsored meals).

5. INCIDENTAL EXPENSES – Incidental expenses are miscellaneous expenses incurred while traveling for College business. Examples include laundry, internet access fees, metered parking, local bus fare, emergency phone calls, business phone calls, reasonable tips.

The College will reimburse the employee for the actual, reasonable expenses if receipts are provided. Instead of using actual expenses and providing receipts, an employee may claim a $3 per day incidental expense per diem.

NON-REIMBURSABLE EXPENSES

Expenses that are not reimbursable are personal in nature and not directly associated with College business. The following are examples: costs for personal life insurance while traveling, travel expenses for family members, movie rentals.

1. Purchases of alcoholic beverages are also not reimbursable unless (i) they occur with dinner and are moderate, or (ii) the employee is using the per diem method for meals. Federal grants can never be charged for alcoholic beverages.

2. Expenses that exceed reasonable guidelines may be determined by the supervisor authorizing the travel, or by management, to be inconsistent with the College’s travel policy. In such a case, the traveler must pay the difference between the actual costs and the amount of costs that were necessary.

3. An expense not substantiated by an original receipt will not be reimbursed. A line item on a credit card statement does not constitute adequate documentation; nor does a credit card slip or online checkout receipt showing just the total without a list of individual items purchased.

AFTER TRAVEL

To get reimbursed for allowable travel expenses that you paid personally, or to account for the expenses paid for with funds received from your travel advance, and to determine the remaining amount due either to you or to the College, file an Expense Report. Expense Report forms are available on the Business Office webpage.

Submit the Expense Report within ten (10) business days of completing your travel. Attach these items to your expense report:

- Original detailed receipts for all items that were paid from your travel advance or that you paid for and for which you wish to be reimbursed.
• If your allowable travel expenses were less than your travel advance, your receipt from the cashier for cash you returned.

Obtain the signature of your Division Chair or Vice President before submitting the report to the Business Office. In some cases, a department manager signature is also required. An incomplete or unsubstantiated Travel Expense Report will delay reimbursement of expenses.

Note: If you have an RMC Master Card, please follow the separate procedures for online expense reports.

Don’t let IRS regulations affect you! A timely, accurate and fully substantiated Expense Report can prevent this.

1. If a travel advance has not been properly accounted for to the College within 30 days after return from the trip, the full advance amount is taxable income and will be added to the employee’s W-2.

2. An expense paid for by the employee must be appropriately accounted for to the College within 60 days after being incurred in order to be reimbursed. If the related Expense Report is not timely received, the expenses paid are not reimbursable to the employee, and not deductible on the employee’s personal return.

Please note: These IRS consequences are in addition to the possible effects that would result from failure to adhere to College policies as stated above.

III. REVIEW AND RESPONSIBILITIES

Responsible Parties: Chief Financial Officer

Review: As deemed as appropriate
I. PURPOSE

Although Rocky Mountain College depends upon the integrity and discretion of its staff with respect to actual or apparent conflict of interest, all employees are subject to the prohibitions of this policy.

II. POLICY

A. Definition

Conflict of interest is the use of one's position and/or employment at Rocky Mountain College to obtain unauthorized privileges, benefits, or items of value for oneself or others.

B. Guidelines

1. It is the burden of the potential employee to disclose any potential conflict of interest to their immediate supervisor. All employees will be required to sign a conflict of interest form as per the attached.

2. No employee shall solicit, accept, or agree to accept any privilege, benefit or item of value for the exercise of his or her discretion, influence or powers as an employee except as allowed by law.

3. No employee shall accept any privilege, benefit or item of value that might influence him or her in the discharge of his or her duties as an employee.

4. No employee shall use his or her position to secure special privileges or exemptions for himself or herself or others, except as allowed by law.

5. Any employee who is an officer, agent, employee or member of, or owns a significant interest in any entity doing business with Rocky Mountain College must disclose such relationship in writing to his or her immediate superior and the Human Resource Department.

6. No employee shall accept employment or engage in any business or professional activity which foreseeably might require or induce him or her to disclose confidential information acquired by reason of his position.
7. No employee shall disclose confidential information gained by reason of his or her position nor shall he or she otherwise use such information for his or her personal gain or benefit.

8. No employee shall transact any business for Rocky Mountain College with any entity of which he or she is an officer, agent, employee, or member, or in which he or she owns a significant interest.

9. No employee should make personal investments in any enterprise which foreseeably might create a substantial conflict between his or her private interests and the interest of Rocky Mountain College in the performance of their duties without prior discussion with and consent by the Human Resource Department.

10. No employee shall accept other employment which might impair his or her independence or judgment in the performance of his or her Rocky Mountain College duties.

11. No employee who exercises discretion in connection with contracts, purchases, payments, claims or other pecuniary transactions shall solicit, accept or agree to accept any benefit from a person or entity the employee knows, or should know, is or is likely to become financially interested in such transactions.

12. Any financial transaction, i.e. sales, purchases, investments, etc. between an employee and the College must have written approval of the Human Resource Department before consummation.

C. Enforcement

Failure of an employee to comply with the foregoing shall constitute grounds for discharge or other disciplinary action.

III. REVIEW AND RESPONSIBILITIES

Responsible Parties: Human Resource Department
Review: As deemed as appropriate