

Grant Contract and Administration Policy

Policy Number	400.03.01	Custodian	Provost
Approved Date	6/5/2026		
Effective Date	6/8/2026	Review Date	04/10/2026

1. Purpose

The purpose of this policy is to ensure that WETCC administers sponsored programs (grants) through a consistent, transparent, and compliant process that meets sponsor requirements, federal regulations, and any additional terms and conditions imposed by federal, state, tribal, or private funding agencies. This policy establishes the framework necessary to promote strong internal controls, responsible stewardship of funds, and accountability throughout all phases of the grant lifecycle.

2. Persons Affected

- 2.1. WETCC employees
- 2.2. Board of Trustees members
- 2.3. Sponsoring agencies and passthrough entities
- 2.4. Sub awardees

3. Policy

This policy is to ensure the following:

3.1. Authority for Award Acceptance

- 3.1.1. The authorized organizational representative (AOR) officially approves all sponsored program applications, awards, contracts, and amendments. The president may serve as the signatory when required by the sponsoring agency or when signature authority exceeds the AOR's delegation.
- 3.1.2. No employee may accept or commit WETCC time or resources to any sponsored agreement without formal approval from the AOR or the president.

3.2. Consistent Administration

- 3.2.1. WETCC implements uniform administrative practices for sponsored programs.
- 3.2.2. Sponsored programs follow institutional standardized procedures for budgeting, reporting, payroll, procurement, documentation, and closeout.

3.3. Compliance with Sponsoring Agency Requirements

- 3.3.1. Administration practices of sponsored programs follow applicable federal

guidelines, including, but not limited to, 2 CFR Part 200, state, tribal, sponsoring agency, and institutional policies, regulations, and award contract terms and conditions.

3.4. Minimizing Risk and Maintaining Internal Controls

- 3.4.1. WETCC maintains internal controls that support integrity and ethical values, stewardship of funds, achievement of stated objectives, protection of data, and accurate reporting.
- 3.4.2. WETCC conducts routine monitoring and review of financial transactions, program activities, data protection (communication, access, and storage), and documentation to identify and assess risks.
- 3.4.3. WETCC promptly implements corrective actions when issues or audit findings arise.
- 3.4.4. WETCC assigns staff responsibilities to promote segregation of duties and reduce the risk of misuse or mismanagement of funds.

3.5. Clarity of Roles and Communication

- 3.5.1. Employees involved in sponsored programs understand their roles, authorities, and responsibilities throughout the grant lifecycle.
- 3.5.2. Supervisors ensure staff receive appropriate training and support related to grant management.

4. Definitions

- 4.1. Authorized Organizational Representative (AOR). The employee formally designated by the president with the authority to submit proposals, accept awards, execute agreements, and make legally binding commitments on behalf of the College.
- 4.2. Code of Federal Regulations (CFR). The CFR is the codification of general and permanent rules published by federal executive departments and agencies that govern the administration of federal awards and federal compliance requirements.
- 4.3. Grant Handbook. The official guiding document for employees in sponsored program management. The Grant Handbook details internal controls, separation of duties, and procedures for proposal review and submission, award acceptance and account setup, budget revisions, cost transfers, expense approvals and procurement, drawdowns, financial and programmatic reporting, records and equipment retention, and closeout.
- 4.4. Grant Manager. The employee who oversees PI-assigned aspects of a grant from award to closeout, including budget tracking, reporting, compliance, and ensuring the project

meets its goals and sponsoring agency requirements.

- 4.5. Internal Controls. Processes designed to ensure accuracy in financial reporting, safeguard assets, ensure compliance with laws and award terms, assess and minimize risk, and promote effective and efficient operations, including segregation of duties, authorization procedures, data protection, audit trails, and documentation standards.
- 4.6. Office of Management and Budget (OMB). The OMB provides government-wide guidance on federal grants and fiscal management, including the Uniform Guidance. It establishes requirements for federal award administration, internal controls, cost principles, audit requirements, and registration standards.
- 4.7. Principal Investigator (PI). The employee who is responsible for the scientific, academic, or programmatic leadership of a project. The PI ensures compliance with award requirements, oversees expenditure management, and provides accurate reporting. In most cases, the PI also functions as the Grant Manager.
- 4.8. Sponsoring Agency (also referred to as granting or funding agency). Any entity that provides a financial award (grant funding) to WETCC. Sponsors may include federal, state, and tribal governments; private foundations; nonprofit organizations; corporations; and individual donors.
- 4.9. Sub-awardee: An entity that receives a portion of grant funds from another grantee.
- 4.10. Unallowable costs. Unallowable costs are expenses that cannot be charged to federal, state, or pass-through grants because they fail to meet the standards of necessity, reasonableness, allocability, or compliance. Costs may be unallowable under federal regulations, state grant policies, sponsor guidelines, or WETCC policies. Any unallowable expenses charged to an award must be removed and repaid from non-grant sources.

5. Procedures

- 5.1. Either the AOR or the president accepts a financial award from a sponsoring agency.
- 5.2. The PI, grant manager, and Finance Department ensure that award activities follow policies and regulations.
- 5.3. Employees in sponsored program management, such as PIs, grant managers, and Finance Department employees, participate in training on WETCC grant management-related policies and procedures.
- 5.4. Employees in sponsored program management use the Grant Handbook to manage their sponsored programs.

6. Revision History

Rev. Date	Rev. No.	Revision
6/5/2026	.01	New policy