



MERCED
COLLEGE

Grants Manual

Office of Institutional Effectiveness

SEPTEMBER 2026

Table of Contents

Welcome	3
Five Grant Phases.....	3
Role of the Office of Institutional Effectiveness (OIE)	3
Cabinet Approval	5
Important Considerations.....	6
Budget Preparation.....	8
Role of Fiscal Services	8
Human Resources (HR)	8
Grant Submission	9
Post Award	9
Grant Reporting and Data Impacts	9
Grant Reporting – Time and Effort (T&E) Federal Requirements.....	11
Important Grant Contacts.....	12
Physical Location.....	13
Appendix	14
A-1 Grant Pre-Approval Form	15
A2: Burton Critical Needs Closeout Example	22
A3: Merced Community College District: Federal Grant Time and Effort Guidelines	23
A4: Federal Subrecipient Monitoring Process	25

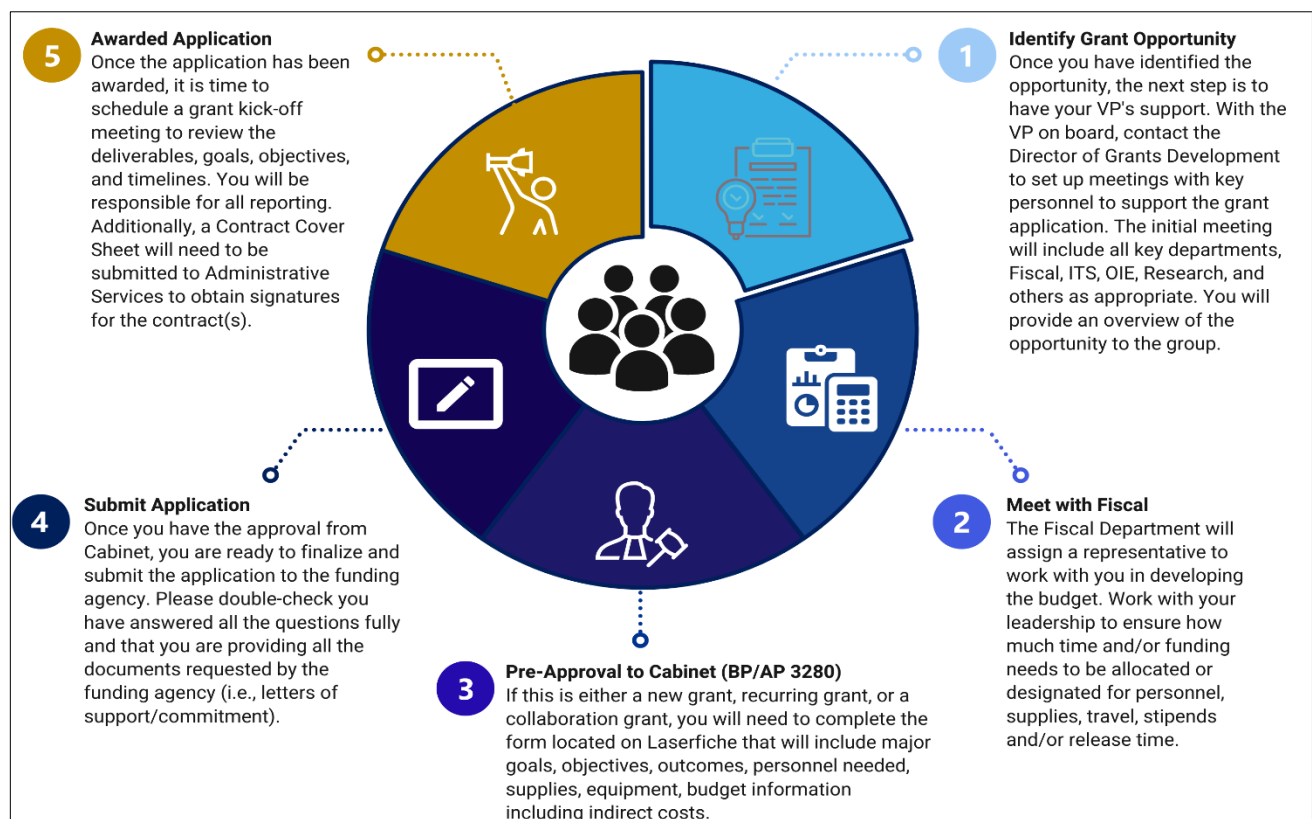


Welcome

Welcome, and thank you for your interest in pursuing grant funding at Merced College. This manual outlines the roles, responsibilities, and required steps for developing, approving, submitting, managing, and closing grants at the College. Grants are intended to support innovative projects that advance the College's mission of transforming lives through education and workforce development.

Five Grant Phases

As the lead grant writer, you will have access to several resources to support your application. Once you have initial support from your VP, you will then contact the Director of Grants Development to coordinate the process and the resources necessary. Always keep your supervisor and VP engaged through the process to minimize any unanticipated delays.



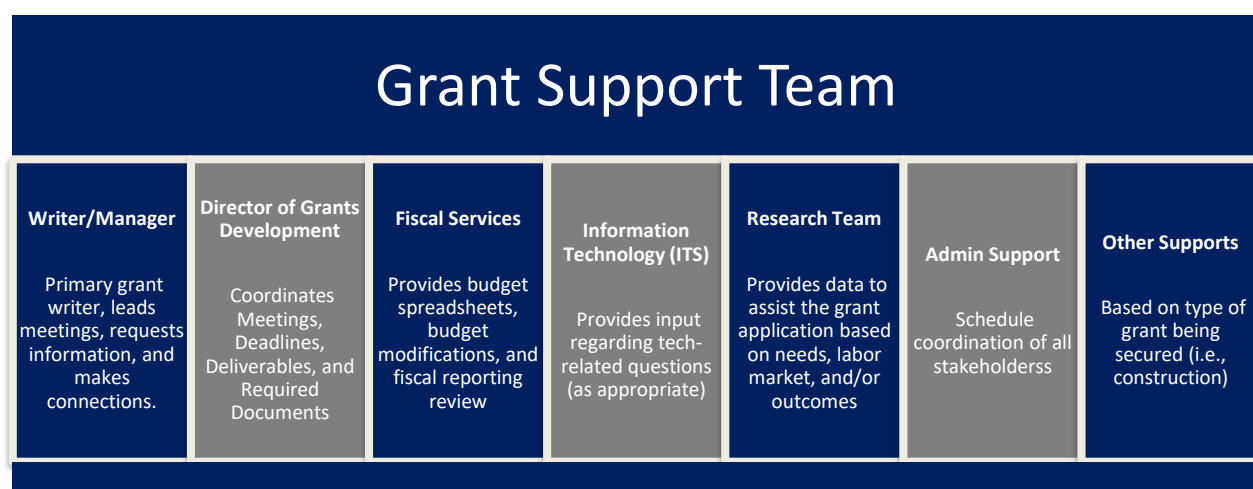
Role of the Office of Institutional Effectiveness (OIE)

The OIE is here to support you through all the grant phases, from pre-project planning through project completion (closeout). The OIE is monitoring multiple

funding sources to support faculty and staff who are in search of specific grant funding opportunities.

OIE, through the Director of Grants Development, will put together a Grant Support Team that will include Information Technology Services (ITS), Office of Institutional Effectiveness (researchers), Fiscal Services (Grants & Categorical), and administrative support to assist you in applying for a grant. The chart below provides additional information on the team (see Fig.1 below).

Fig. 1 – Grant Support Team



Through this Grant Support Team, you will be able to discuss the grant guidelines, ideas, options, deliverables, and deadlines to ensure you will have all of the information and support necessary to successfully apply for funding.

Five (5) Pre-Approval forms accommodate the various funding opportunities. One form is required to inform and obtain approval from Cabinet before completing and submitting a grant application. These forms can be found on the Merced College website at the following location: [Grants Website](#)

The five forms are the following:

1. Grant Pre-Approval Form (see Appendix for an example of this form).
2. Recurring Grant Form for all continuing grants or grants that have been secured in the past five years.

3. Collaboration Grant Form for projects where Merced College is collaborating with other organizations, such as non-profits, UC Merced, CSU-Stanislaus, or another community college.
4. The Grant Change Form is used to inform Cabinet of a change in a funded grant condition, including, but not limited to funding increase/decrease, grant duration, change in number of students served, etc.).
5. The Funding Opportunity Notification Form is used to gather information about a (non-competitive) funding opportunity that may be available to Merced College.

The Grant Completion Form is designed to capture all the work you've accomplished through the grant, and the district thanks you for your time. This information will be used to gather and report the outcomes. Your information will be used to create an infographic to share what was accomplished with the campus community.

In order to ensure progress is being made before the application deadline, OIE will schedule ongoing weekly meetings with the Grant Support Team to ensure that sufficient time is dedicated to writing the grant. There are two important deadlines that all parties must be made aware of from the beginning:

- 1st - The deadline that the Pre-Approval, Collaboration, or Recurring Grant form listed above must be submitted to Cabinet, and
- 2nd - The deadline for grant submission to the respective funding agencies.

Cabinet Approval

Merced College has an internal process for applying for all grants, which requires Cabinet approval. The Pre-Approval forms are used to gather information such as the purpose of the grant and population served, length of the grant, the proposed budget, in-kind or matching requirements, and personnel needed to implement the grant. This information helps Cabinet make a data-informed decision on how well the grant aligns with the mission of Merced College. The Vice President (VP) from your corresponding area will introduce and advocate for the grant approval at Cabinet; therefore, it is imperative that your manager and VP support the grant opportunity from the beginning. Cabinet meets weekly and will require lead time

(before the submission deadline) for review and approval. Without Cabinet approval, you cannot submit for the grant.

Letters of Support may be requested if a college partner requires one (i.e., when partnering with UC Merced, Stanislaus State, or other entities) for their grant application. Letters of Support must be approved by the President before providing them to college partners.

The Director of Grants Development at OIE will guide you through the appropriate process and help you choose the right form to use based on the grant application and/or request by college partners.

Important Considerations

The preparation of a competitive grant application will require a substantial amount of time. This intense process requires detail-oriented, technical writing skills. Not all grants are the same, and many factors determine the amount of time required to complete the grant application. Because of the uncertainty of time for each application, a grant application must begin several weeks, or when possible, months before the application is due.

Grant applications that are planned in advance have a much higher success rate than those that are written at the last minute. Last-minute writing will lead to high stress that will be reflected in the writing and should be avoided. In fact, the most successful grant writers often refuse to work on eleventh-hour grant projects because they know that the chances of winning an award written in a rushed manner are slim. In addition, a last-minute request runs the risk of not being approved by the Cabinet.

The Grant Approval Journey, posted online on the Merced College website, shares helpful tips and provides information regarding the Cabinet-Approved process for grant applications to earn the seal of approval.

Grant Approval Journey

You cannot submit a grant in a vacuum! Follow the steps below to ensure your grant will get the approval and support it needs to be submitted.

1. Plan Ahead

Submissions must be made to Cabinet at least 8 weeks prior to grant submission

deadline. Contact the Director of Grants Development to let them know you are considering pursuing a grant. If you have less than 8 weeks, the Director of Grants Development will help you determine if it's feasible to apply.

2. Talk with your direct supervisor and VP

Talk with your direct supervisor and VP to make sure they support pursuing the grant support before beginning the process and sending the pre-approval form to Cabinet.

3. Meet with the Director of Grants Development

Meet with the Director of Grants Development to get guidance and discuss any data and grant evaluation needs for the grant narrative and budget. The Grant Director will put together a team that you will work with throughout the grant process.

4. Work with Fiscal Services to develop a proposed budget

The Fiscal Services department has extensive knowledge and experience with grant budgets. They will play a critical role in grant implementation, so it is necessary to get their involvement from the beginning. Meeting with Fiscal Services to develop a proposed budget from the grant narrative or budget narrative is a required component of the pre-approval process.

5. Complete the Preapproval Form

You cannot apply for a grant without getting Cabinet approval first. You must complete the Grant Preapproval form that will be submitted to Cabinet for their consideration. The form will go through an approval process, first reviewed and approved by your supervisor, then will be forwarded to Fiscal Services, the Dean of OIE, your VP, ITS, who will take the request to Cabinet. Working with the grant team from the beginning will make the process easier.

6. Post Cabinet Review

- If Cabinet approves moving forward with the grant, continue to work with OIE through the grant submission process (this will continue through the life of the grant).
- If Cabinet does not approve moving forward with the grant, talk with the Director of Grants Development to find out the reasons and if it is feasible to consider other grant projects that will better fit the expectations/guidance from the Cabinet.

Budget Preparation

The financial component of a proposal usually consists of a Budget Summary and a Budget Narrative/Justification. **You will work with Fiscal Services**, as they are experts and can provide you with a budget spreadsheet that incorporates all of the grant guidelines. Fiscal will also help you calculate Indirect Cost Rates and adjust budgets for multi-year requests (that may need to incorporate yearly increases in salaries and/or benefits). Working with Fiscal from the beginning will also make completing the pre-approval forms easier.

Role of Fiscal Services

It is important to note that the role of fiscal representatives is primarily that of Approver/Filer. Fiscal representatives are listed in competitive grants as the responsible fiscal entity that will be reporting fiscal-related information and follow the Financial Management rules as per Code of Federal Regulations (CFR) §200.302. It is the responsibility of the Grant Manager to have a thorough understanding of the reporting and oversight process as these pertain to the grant they have secured. Fiscal will approve and submit standard grant reporting forms (e.g., SF-270, SF-425, SF-425a).

Fiscal staff should not be expected to complete fiscal reports; they are available to provide guidance and review of information being submitted to the funding agency. Oftentimes, Fiscal representatives are listed in NOVA as either the Fiscal Report Approver or the Institutional Project Fiscal Reporter and sign off on fiscal-related reports and plans. However, to reiterate, the completion of fiscal reports is the responsibility of the Grant Manager. Meeting regularly with your fiscal representative will make the process more efficient and will ensure that you will always know where you stand in terms of overall grant expenditure.

The fiscal department's goal is to provide effective control over, and accountability for, all funds, property, and other assets. Fiscal must adequately safeguard all assets and ensure that they are used solely for authorized purposes as per Internal Controls found in [CFR § 200.303](#).

Human Resources (HR)

Most grants will require personnel, and all new positions will need to be discussed with HR to fully understand the implications and job descriptions tied to the different positions on campus for all positions (including student workers).

Oftentimes, a meeting with HR should include the individual assigned to your grant by Fiscal to ensure that costs are accurate, as these costs tend to increase over time, and all individuals have different rates for salaries and fringe benefits. During your initial conversation with the Director of Grants Development, you will be asked if you plan to hire staff for the grant. If you will, HR will be invited to the meetings until the grant has been submitted, and then back again for the kickoff meeting upon the successful awarding of the grant.

Grant Submission

For grant submission, it is required that you share your budget and other materials with your supervisor, Dean, and VP throughout the entire process to ensure you have their full support and to minimize budget changes. Oftentimes, key individuals from the support team may be out of the office and may not be available to provide you with the changes requested in time to submit the application. Give yourself as much time as possible to have all of the required documents with at least a couple of days lead time to apply to thwart any last-minute delays (internal or external).

Post Award

Grant Reporting and Data Impacts

- Quarterly, Semi-annual, Final Reporting
 - You will be required to submit regular reports (e.g., Performance Progress Reports) documenting the project throughout its lifespan. OIE will work with you to track the reporting cycle and if necessary, set up meetings to secure as much information as possible for the reports.
- Data Impacts for Reporting
 - The Grant Manager will identify initial and ongoing data for their grant needs, including the type and frequency of data needed for ongoing reporting. The Grant Manager will submit a request for the researchers to add the ongoing request to their calendar to ensure sufficient time is provided to gather the information requested.
- Fiscal Management
 - Fiscal Reporting will be driven by the type of grant you've been awarded, and is detailed in the compliance and reporting section of the Grants Handbook provided by the funding agency. The handbook will contain the Reporting Period and the Performance Report Due Dates. The Grant Manager is responsible for working with the appointed fiscal

representative to ensure that the information reported is accurate.

- Drawing down funds is how Merced College is reimbursed and paid for services on an ongoing basis, with the frequency depending on the type of grant and based upon activities listed in the workplan and reported. Merced College submits programmatic and fiscal reporting, requesting reimbursement from the funding agency. The Grant Manager is responsible for uploading/submitting the information into the corresponding system. The information is verified by a Fiscal Manager who reviews and approves the information entered by the Grant Manager.
- Modifications
 - Fiscal Modifications (budget changes) are sometimes necessary to get back on track in the event of program delays. The Grant Manager will review the requirements needed to secure a fiscal modification as referenced in the grant handbook and/or in the original signed grant agreement. It is advisable to ensure the designated Project Monitor is made aware of any changes to budget categories to ensure quick approval. In the event that budget categories need to be added or deleted, express prior written consent is required by the grant's Project Monitor.
 - Timelines that need to be extended due to program delays must be documented and are considered amendments to the grant.
 - Amendments are often required to extend the completion date, materially change the work to be performed, and/or alter the budget. Requests for an amendment must be submitted to the Project Monitor and made as soon as the need for an amendment arises.
 - A compelling justification will be needed to secure an amendment.
- Federal Subrecipient Monitoring
 - If subrecipients are needed to satisfy the grant requirements, the Grants Office will assist with the Federal Subrecipient Monitoring (see Attachment A-4 for the detailed process).

Grant Reporting – Time and Effort (T&E) Federal Requirements

As a recipient of federal funding, the District is required to comply with the Office of Management and Budget Circular Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (“Uniform Guidance”) as well as requirements for certifying effort expended on sponsored awards, 2 CFR Part §200.430, Compensation-personal services. Time and Effort Certification confirms that the salaries and benefits charged to, or pledged as a cost share to, grant-funded projects are reasonable and reflect the actual work performed.

Section §200.430(i) states the standards for documentation of personnel expenses charged to Federal awards for salaries and wages must be based on records that accurately reflect the work performed, and that these records must:

- Be supported by a system of internal control which provides reasonable assurance that the charges are accurate, allowable, and properly allocated;
- Be incorporated into the official records of the non-Federal entity;
- Reasonably reflect the total activity for which the employee is compensated by the non-Federal entity, not exceeding 100% of compensation activities;
- Encompass both federally and all other activities compensated by the non-Federal entity on an integrated basis (i.e., teaching, research, administrative) but may include the use of subsidiary records as defined in the non-Federal entity’s written policy;
- Comply with the estimated accounting policy and practices of the non-Federal entity for Additional Compensation; and
- Support the distribution of the employee’s salary or wages among specific activity or cost objectives if the employee works on more than one Federal award; a Federal award and non-Federal award; an indirect cost activity and a direct cost activity; two or more indirect activities which are allocated using different allocation bases; or an unallowable activity and a direct or indirect cost activity.

Budget estimates (i.e., estimates determined before the services are performed) alone do not qualify as support for charges to Federal awards.

During the grant kickoff meeting, you will discuss the Merced Community College District: Federal Grant Time and Effort Guidelines and the T&E process with Fiscal Staff to ensure that you are using the appropriate forms (see Appendix A-3).

Changes to the Grant

It is customary for grants to require an adjustment based on numerous factors such as delays in obtaining initial grant funding and/or delays in hiring appropriate staff to ensure the goals of the grant are on track and will be accomplished. The modification re-establishes and updates timelines and is worked in tandem with the grant program officer and Fiscal Services. Whatever the reason may be, you may need to modify the grant and request a no-cost time extension. Fiscal and Cabinet will need to be notified of any changes to the grant, either as they relate to time extensions, an increase or decrease in funding, or if any other changes are necessary. The Director of Grants Development will guide you through the process and work with you to successfully make changes to the grant.

Closing out the Grant

Depending on the type of grant secured, closeout means the process by which the awarding agency or pass-through entity determines that all applicable administrative actions and all required work of the award have been completed. Oftentimes, the closeout section may reference Code of Federal Regulations (CFR) Section [§200.344](#) entitled Closeout. The Grants Handbook, provided by the funding source, is the guide you should follow to ensure that the grant is properly closed out, which may include:

- Final Budget Report, and a
- Fiscal Program Closeout Report.

A College Report Out (see Burton infographic example in the Appendix) may be used to inform the College of the outcomes and impacts the grant produced.

Important Grant Contacts

Alfredo Mendoza

Director, Grants Development
(209) 381-6578
alfredo.mendoza@mccd.edu

Andre Urquidez

Director, Business & Fiscal Services
(209) 384-6209
andre.urquidez@mccd.edu

Kimberly Freitas

Associate Director, Business & Fiscal Services

(209) 384-6202

kimberly.freitas@mccd.edu

Physical Location

The Office of Institutional Effectiveness is located in the Business & Economics (B&E) Building, 2nd Floor, Room 205, listed as “B&E” on the [map](#).

Appendix

Name	Page
A-1: Example of Grant Pre-Approval Form	15
A-2: Example of Burton Critical Needs Grant Closeout	22
A-3: Merced Community College District Federal Grant Time and Effort Guidelines	23
A-4: Merced College Federal Subrecipient Process	25

A-1 Grant Pre-Approval Form

A-1 Grant Pre-Approval Form



Grant PreApproval Proposal Form

The purpose of this form is to gather information about a potential Grant opportunity for review by the President's Cabinet. The grant concept is reviewed by Cabinet to ensure that the grant proposal is directed to Student Success, aligns with the Mission of Merced College and ensures Sustainability of the College.

Once you complete this form it will be routed to your direct supervisor, the Dean of Institutional Effectiveness, and the Business and Fiscal Office for approval. Once approved it will be submitted to the Cabinet.

Name of person submitting Preapproval Form

Your Name

Email of person submitting Preapproval Form

first.last@mccd.edu

Requestor Role

Faculty/Supervisor

Immediate Supervisor

Your Supervisor

Grant proposals must be submitted to Cabinet for approval at least eight weeks prior to grant submission deadline. Is it at least eight weeks prior to the grant submission deadline?

- ☐ Yes
☒ No

Since it is less than 8 weeks before the grant submission deadline please contact your direct supervisor and/or the Dean of Office of Institutional Effectiveness to discuss the submission of the Pre-Approval form.

Is there less than 3 weeks before grant submission deadline?

- ☐ Yes
☐ No

Date of proposal submission deadline?

Enter Date

What is the Funding Agency for this Grant?

Enter Funding Agency

Is the funding agency for this grant a federal agency, state agency, or a private company?

- ☒ State Agency
☐ Federal Agency
☐ Private Company
☐ Other

CFDA # (?)

Is this a new or continuing Grant?

- ☒ New
☐ Continuing
☐ Other

What is the term of the Grant? (How many years of funding are being requested?)

Enter number of years

What is the total amount being requested by Merced College?

\$ 0.00

Is fund matching required?

- ☐ Yes ☒ No

Matching Funds

Funds

Where will this funding come from?

Will Merced College be partnering with any other institutions for this Grant?

- ☐ Yes
☒ No
☐ Other

What is the working title for the project

Enter your working title

Please summarize the proposed project and explain how it benefits Merced College.

Enter a couple paragraphs to answer this question

Please attach any supporting documents that you feel are important in describing the project and its benefits to Merced College

(Multiple documents may be uploaded)

What are the major goals, objectives, and or outcomes of the project? What groups are likely to benefit from the project?

Bulleted list, or several paragraphs may suffice.

Please attach any supporting documents that you feel are important in describing the goals, objectives, and or outcomes.

What personnel do you need (including yourself) to carry out the work of this project?

Name	Time needed for project activities	Association with Merced College
------	---------------------------------------	------------------------------------

Personnel	Name of Individual	Enter time needed (per week)	Faculty/Staff
Personnel	Individual 2	Enter time needed (per week)	Faculty/Staff
Personnel	Individual 3	Enter time needed (per week)	Faculty
Personnel	Individual 4	Enter time needed (per week)	Staff

(Note: Personnel listed here may be participating as part of their normal job duties and not necessarily paid from the grant)

Will Merced College Faculty need release time from other responsibilities to work on this project?

☐ Yes ☒ No ☐ Other

Who will oversee the administration of the Grant, including budget and reporting?

This is usually the individual completing the form.

Did you work with the Business and Fiscal Services Office on your proposed budget?

☐ Yes **This is very important**

☐ No

☒ Other

Supplies

	Type	Cost to Purchase	Other costs	Total
Supplies	0	\$ 0.00	\$ 0.00	\$ 0.00

Total Supply Costs

\$ 0.00

Equipment Needs

Type of equipment	Cost to Purchase	Cost to Maintain	Cost of Installation	Additional Costs	Total
-------------------	------------------	------------------	----------------------	------------------	-------

Equipment 1 \$ \$ \$ \$ \$ 0.00

Total Equipment Costs

\$ 0.00

What space is required to maintain activities for the project?

Service/Travel(Ex: consultants, marketing, conferences, workshops, etc.)

Service/Travel	Cost of Service/Travel
----------------	------------------------

Service/Travel 1	\$
------------------	----

Total Cost of Service/Travel

\$ 0.00

Personnel Budget

Name	Salary	Stipend	Benefits	Other	Personnel Cost
Personnel 1	\$	\$	\$	\$	\$ 0.00

Total Personnel Costs

\$ 0.00

Indirect Costs

\$ 0.00

Estimated Total Project Costs

\$ 0.00

How will the budget be used to accomplish the intended purpose of the grant? Please explain any "other" or "additional costs" included in the supplies, equipment needs, and personnel budgets above.

Describe how the budget will be used.

Please attach any supporting documents that you feel are important in describing how the budget will be used to accomplish the purpose of the project.

Attach the Budget from Fiscal that you used to provide the Personnel, Service/Travel, etc.

The Office of Institutional Effectiveness is a valuable resource in grant submissions and management. Have you discussed this research project and your data needs with the Dean of Office of Institutional Effectiveness?

- ☒ Yes
☐ No
☐ Other

Have you contacted ITS about the planned software and technology needs for this grant?

- ☐ Yes
☒ No
☐ Other

Please contact the Associate Vice President of Information Technology Services, Arlis Bortner (arlis.bortner@mccd.edu), regarding the technology that is planned to be used and/or purchased with this grant so ITS can provide guidance.

Provide a brief description of your technology needs.

None.

Will you need to form an advisory group for this project?

- ☐ Yes
☒ No
☐ Other

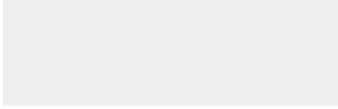
Indicate any institutional commitments that will be required to maintain the project beyond the end of the grant.

Indicate the Institutional Student Learning Outcomes that will be met with this Grant.

- ☒ Communication
☐ Computation
☐ Cognition
☒ Global & Community Consciousness and Responsibility
☒ Personal Development and Life-Long Learning
☐ NA

Select all of the Strategic Goals from the 2018-2023 Educational Master Plan that will be addressed by the Grant.

- ☐ Employ Enrollment Management Strategies to support Student Success, Progression, and Completion/Transfer
☐ Increase Student Access and Streamline Entry Processes
☐ Maximize Future Financial Stability Via Data Driven, Long Range, Integrated Fiscal Planning
☐ Strengthen Campus Safety and Align Facilities and Technology Planning with Educational Master Planning
☒ Strengthen Existing and Create New Partnerships with Educational Institutions, Employers, and Government and Community Agencies to Support EMP goals
☐ Design Streamlined, Integrated Technological and Human Systems that Work Effectively Towards Desired Outcomes

Signature of person applying for Preapproval

Thank you for submitting your Grant Preapproval proposal. The Office of Institutional Effectiveness will keep you updated on its progress through the process.

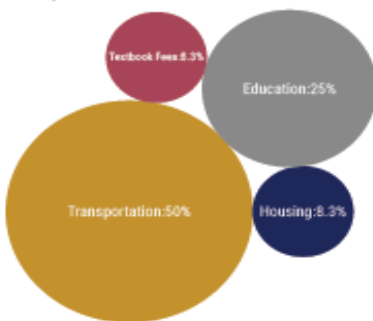


A2: Burton Critical Needs Closeout Example

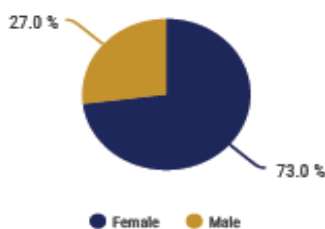
Burton Critical Needs Grant Recipients

The Burton Critical Needs Grant was awarded to Merced College in July of 22. This was a 1 year, \$6000 grant whose purpose was to pay expenses related to a youth's critical need or opportunity. The eligibility requirements were that the student must be between 16 and 26 years of age and have been in foster care or experienced homelessness at some point. This grant aided 20 students with their needs associated with housing, transportation, utilities, textbook fees, and the cost of education.

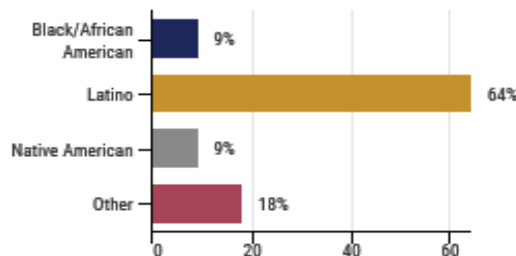
Requests Reasons



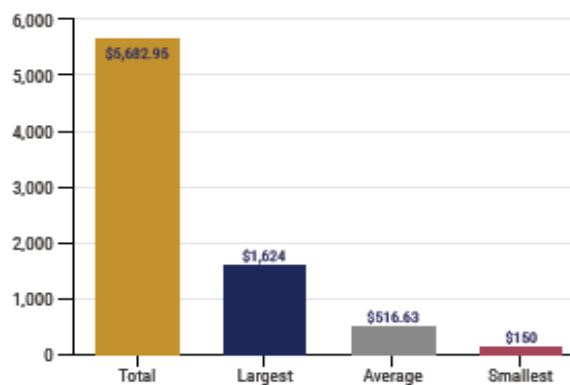
Recipient Gender



Race/Ethnicity of Requestors



Amounts Distributed



A3: Merced Community College District: Federal Grant Time and Effort Guidelines



Merced Community College District: Federal Grant Time and Effort Guidelines

1. Purpose

The purpose of this guidance is to ensure that the Merced Community College District (MCCD) complies with federal regulations regarding the documentation of personnel costs charged to federal grants. This system provides a method for verifying that the compensation charged to each federal award is accurate, allowable, and properly allocated based on the actual activity of the employee.

2. Authority and Scope

- **Regulatory Basis:** 2 CFR §200.430 (Compensation – Personal Services).
- **Applicability:** All MCCD employees (faculty, staff, and student workers) whose salaries are charged as a whole or in part to a federal award, or whose time is used to meet federal cost-sharing (match) requirement.

3. Reporting Requirements

MCCD utilizes an "After-the-Fact" activity reporting system. Reports must reflect **100% of the employee's total compensated activity**, not just the portion dedicated to the federal grant.

A. Semi-Annual Certification (Single Cost Objective)

Employees who work **100%** of their time on a single federal award or cost objective may complete a **Semi-Annual Certification** and submit it to the Fiscal Office.

- **Frequency:** Twice per year (typically aligned with the end of the Fall and Spring/Summer terms).
- **Content:** A statement signed by the employee or a supervisor with first-hand knowledge, certifying that the employee worked solely on that specific federal program for the period covered.

B. Time and Effort Reporting

Employees whose time is split between a federal grant and other District duties (e.g., teaching, general administration, or multiple grants) must maintain **Time and Effort Reports (T&Es)**.

- **Frequency:** As appropriate in accordance to grant guidelines.
- **Content:** A breakdown of percentages spent on each specific activity. Reports must be based on **actual effort**, not budget estimates.

4. Reconciliation of Budget to Actuals

Federal regulations allow payroll to be processed based on budget estimates, provided MCCD performs regular reconciliations:

- **Review:** The Fiscal Office will compare actual effort (in the signed reports) to the payroll amounts charged to the grant.
- **Adjustments:**
 - If there is a variance, MCCD will adjust the payroll charges in the accounting system to reflect actual effort and adjust future budget projections.

5. Records Retention

In accordance with **2 CFR §200.333**, all time and effort documentation (including digital logs and signed certifications) must be retained for **three (3) years** from the date of submission of the final expenditure report, or longer if there is an ongoing audit or litigation. The Fiscal Office will retain these documents within the grant reporting package support.

6. Non-Compliance

Failure to submit accurate and timely effort reports may result in:

1. Disallowed costs (repayment of salary/benefits to the federal agency).
2. Suspension of grant funding.

A4: Federal Subrecipient Monitoring Process



Federal Subrecipient Monitoring Process

Responsible Office: Grants Office

Effective Date: July 1, 2026

Last Revised: September 16, 2026

Purpose

This process describes how the Merced College Grants Office supports Grant Managers and monitors subrecipients funded through federal grants. The Grants Office coordinates monitoring activities, connects Grant Managers with Fiscal Services, Data, and other campus resources, and maintains the monitoring evidence needed to demonstrate the College's compliance as a pass-through entity. The Grant Manager remains responsible for the subaward agreement and approval process, grant performance reporting, and grant closeout activities.

Scope

This process applies when a federal grant secured by Merced College includes a subrecipient that will carry out part of the federal program. It does not apply to procurement contracts for goods or services. The process begins when the Grant Manager identifies a proposed subrecipient or when an awarded federal grant names or includes a subrecipient.

For the current implementation period, the Grants Office coordinates subrecipient monitoring. The Grants Office supports the Grant Manager by organizing and implementing monitoring, requesting and documenting evidence, identifying concerns, and providing subrecipient monitoring reporting.

. This process does not transfer the Grant Manager's responsibility for administering the grant or the subaward.

Authority

- 2 CFR 200.331, Subrecipient and contractor determinations
- 2 CFR 200.332, Requirements for pass-through entities
- 2 CFR Part 200, Subpart F, Audit Requirements
- Applicable federal award terms and agency guidance
- Applicable Merced College policies and procedures

Roles and Responsibilities

Grants Office

The Grants Office supports the Grant Manager and coordinates subrecipient monitoring. The Grants Office shall:

- Assist the Grant Manager in documenting whether a proposed relationship is a subaward or a procurement contract.
- Verify the prospective subrecipient's legal name, Unique Entity Identifier, SAM.gov registration, and exclusion status.

- Evaluate fraud risk and the risk of noncompliance before issuing a subaward and reassess risk during the period of performance.
- Provide the Grant Manager with the federal information and monitoring provisions that should be included in the subaward agreement.
- Establish the monitoring level, schedule, reporting requirements, and any specific conditions.
- Monitor the subrecipient using financial reports, performance reports, invoices, deliverables, audit information, and other available evidence.
- Coordinate with the Grant Manager, Fiscal Services, Data, Purchasing, and other campus areas when specialized review or support is needed.
- Document monitoring results, communicate concerns to the Grant Manager, and track corrective action through resolution.
- Maintain the official subrecipient monitoring file so the College can demonstrate its monitoring during a Single Audit or other review.

Grant Manager

The Grant Manager administers the grant and the subaward. The Grant Manager shall:

- Identify proposed subrecipients and provide the Grants Office with the information needed for classification, preaward review, and risk assessment.
- Secure the subaward agreement and route it through the College approval process, including Cabinet and the Board of Trustees when required.
- Ensure that approved agreements and amendments are fully executed and provide copies to the Grants Office for the monitoring file.
- Manage the subrecipient's programmatic work and maintain communication concerning performance, deliverables, deadlines, and concerns.
- Prepare and submit all required grant performance reports and obtain subrecipient information needed for those reports.
- Review and approve programmatic performance and deliverables associated with invoices or payment requests.
- Lead grant and subaward closeout, including final performance reporting and confirmation that required deliverables are complete.
- Respond to monitoring concerns and work with the Grants Office and appropriate campus offices to resolve issues.

Campus Partners

Fiscal Services, Data, Purchasing, Risk, Facilities, and other campus areas provide subject-matter support within their assigned functions. The Grants Office helps connect the Grant Manager with these resources and coordinates the collection of monitoring evidence. Campus partners do not replace the Grant Manager's responsibility for grant administration or the Grants Office's responsibility for subrecipient monitoring documentation.

Process Overview

1. Support and document the subrecipient or contractor determination.
2. Complete pre-award verification and risk assessment.
3. Assign a monitoring level and establish the monitoring plan.
4. Support the Grant Manager during agreement development and approval.
5. Monitor the subrecipient's performance, financial activity, compliance, and audit status.
6. Use invoices and payment documentation as monitoring evidence.
7. Address deficiencies and track corrective action.
8. Document monitoring through Grant Manager-led closeout and retain the monitoring file.

Step 1 - Determine the Relationship

Before an agreement is issued, the Grant Manager shall notify the Grants Office of the proposed relationship. The Grants Office shall support the Grant Manager in evaluating the substance of the relationship using 2 CFR 200.331. The written determination must explain whether the outside organization will carry out part of the federal program as a subrecipient or provide goods or services for the College's use as a contractor. No single characteristic is determinative.

The Grant Manager shall provide the information needed for the determination. The Grants Office shall retain the completed determination and supporting information in the monitoring file.

Step 2 - Complete Preaward Verification and Risk Assessment

Before issuing a subaward, the Grants Office shall verify and document:

- The organization's legal name and Unique Entity Identifier match its SAM.gov record.
- The organization is not suspended, debarred, excluded, or otherwise disqualified from receiving federal funds.
- The organization has the legal and operational capacity to perform the proposed work.
- Available Single Audit reports, audit findings, corrective actions, and other relevant monitoring results have been reviewed.

The risk assessment shall address fraud risk and the risk of noncompliance. Factors may include:

- Prior experience with the same or similar federal awards or subawards
- Prior performance and responsiveness
- Financial stability and internal controls
- Results of previous audits and whether the same or similar program was audited as a major program
- New personnel or new or substantially changed systems
- Federal or other pass-through monitoring results
- Organizational capacity and complexity of the proposed work
- Size and duration of the subaward

The Grants Office shall document the risk rating, monitoring level, rationale, and any required specific conditions.

Step 3 - Establish the Monitoring Plan

The Grants Office shall select monitoring activities that are proportionate to the assessed risk. The monitoring plan shall identify required reports, invoice documentation, review frequency, responsible Grants Office staff, scheduled meetings or site visits, and any conditions that must be satisfied before or during performance.

Monitoring Level	Minimum Approach	Possible Additional Measures
Standard	At least semiannual performance review and review of each invoice or payment request	Supporting documents requested as needed
Elevated	At least quarterly performance and financial review, with annual risk reassessment	More detailed invoice support, monitoring meetings, or targeted testing, may include site visit
Enhanced	Monthly or other frequent review established by the Grants Office	Specific conditions, site visits, technical assistance, agreed-upon procedures, or reimbursement-only payment

Step 4 - Support Agreement Development and Approval

The Grant Manager is responsible for securing the subaward agreement and routing it through the College approval process, including Cabinet and the Board of Trustees when required. The Grants Office shall provide the Grant Manager with the federal award information and monitoring terms needed for the agreement. The agreement should identify the instrument as a subaward and include, as applicable:

- Subrecipient legal name and Unique Entity Identifier
- Federal Award Identification Number and federal award date
- Subaward period of performance and budget period dates
- Current obligation, cumulative amount obligated, and total amount committed to the subrecipient
- Federal award project description
- Federal agency, Merced College as the pass-through entity, and College awarding official contact information
- Assistance Listings title and number and the amount made available under each applicable federal award
- Whether the award supports research and development
- Applicable indirect cost rate, including an approved negotiated rate or the de minimis rate when elected and allowable
- Statement of work, budget, deliverables, reporting requirements, payment terms, and performance measures
- Applicable federal statutes, regulations, award conditions, certifications, and federal flow-down requirements
- Access to records and financial statements for monitoring and audit purposes
- Record retention, remedies, termination, and closeout requirements

The Grant Manager shall ensure that the agreement is approved and fully executed before work begins or costs are charged, unless the federal agency has specifically authorized otherwise in writing. The Grant Manager shall provide the executed agreement and amendments to the Grants Office. The Grants Office shall retain them with the monitoring documentation and update unavailable federal award information when it becomes available.

Step 5 - Conduct Ongoing Monitoring

The Grants Office shall monitor the subrecipient throughout the period of performance. At a minimum, monitoring shall include:

- Reviewing copies of financial and performance information supplied by the Grant Manager or subrecipient as monitoring evidence
- Comparing available results with the statement of work, milestones, deliverables, and approved budget
- Tracking reporting deadlines and following up on late or incomplete submissions
- Reviewing significant developments that may affect the subrecipient's ability to meet objectives
- Reviewing audit information and verifying that the subrecipient receives a Single Audit when required
- Documenting monitoring contacts, conclusions, required follow-up, and changes to the monitoring plan

The Grant Manager remains responsible for performance management and all required performance reporting. The Grants Office does not prepare or submit the Grant Manager's performance reports. The Grants Office may obtain programmatic confirmation from the Grant Manager, financial information from Fiscal Services, data support from the appropriate campus office, and other specialized review as needed.

Step 6 - Monitor Invoices and Payment Requests

The Grant Manager is responsible for confirming programmatic performance and deliverables associated with an invoice or payment request. Fiscal Services processes payments under College procedures. As part of subrecipient monitoring, the Grants Office shall review available invoice and payment documentation and document whether:

- The billing period falls within the approved period of performance.
- Costs are consistent with the approved budget and applicable payment terms.

- Costs appear allowable, allocable, reasonable, and properly supported.
- Required performance reports and deliverables have been received and are satisfactory.
- Prior questions, questioned costs, or required corrective actions that affect payment have been resolved.

The Grants Office may request supporting documentation and coordinate questions with the Grant Manager, Fiscal Services, or another campus area. The Grants Office shall document the review and any follow-up in the monitoring file. The Grants Office's monitoring review does not replace the Grant Manager's programmatic approval or Fiscal Services' payment-processing responsibilities.

Step 7 - Review Audit Information and Resolve Findings

At least annually during an active subaward, and again at closeout when applicable, the Grants Office shall:

- Determine whether the subrecipient was required to obtain a Single Audit and verify completion when required.
- Review audit findings, questioned costs, management responses, and corrective actions relevant to the subaward.
- Ensure that significant developments affecting the subaward are addressed through corrective action.
- Issue a management decision for audit findings pertaining only to the federal award provided through Merced College, as required by 2 CFR 200.521.
- Resolve findings specifically related to the subaward and monitor the status of relevant cross-cutting findings.
- Consult the Grant Manager and appropriate campus offices when monitoring results may require changes to College records, payment decisions, risk ratings, or the monitoring plan.

Step 8 - Address Noncompliance and Corrective Action

When monitoring identifies a deficiency, the Grants Office shall document the issue and determine the required response. The response may include:

- Written notice describing the issue and the applicable requirement
- A corrective action plan with responsible parties and due dates
- Additional documentation, reporting, training, or technical assistance
- More frequent monitoring, a site visit, or targeted testing
- Specific conditions or reimbursement-only payment

The Grants Office shall notify the Grant Manager of deficiencies and track corrective action through resolution. The Grant Manager shall work with the subrecipient and appropriate campus offices to carry out required corrective or enforcement actions. When noncompliance remains unresolved or is material, the Grant Manager and Grants Office shall consult appropriate College leadership regarding remedies permitted by 2 CFR 200.339, program regulations, and the subaward, including withholding payments, disallowing costs, suspending activities, terminating the subaward, or pursuing other available remedies.

Step 9 - Complete Closeout

The Grant Manager is responsible for grant and subaward closeout, including final performance reporting and confirmation that required deliverables are complete. The Grants Office shall support the Grant Manager by identifying unresolved monitoring matters and shall document the following in the monitoring file before monitoring is closed:

- Final performance and financial reports have been received and accepted.
- The final invoice or payment request has been reviewed and reconciled to College records.
- Required deliverables have been completed.
- Questioned costs, corrective actions, audit findings, and other outstanding matters have been resolved or documented for continued follow-up.
- Property or equipment disposition requirements have been addressed, when applicable.

- Unused funds, refunds, and final adjustments have been processed, when applicable.
- The subrecipient has been notified of closeout and continuing record-retention obligations.

Official Monitoring File

The Grants Office shall maintain the official subrecipient monitoring file so the College can demonstrate how it monitored each subrecipient during a Single Audit, agency review, or other examination. The file shall include, as applicable:

File Category	Required Records
Classification	Subrecipient or contractor determination and supporting analysis
Preaward review	SAM.gov and exclusion verification, Unique Entity Identifier verification, risk assessment, and approvals
Agreement	Copies of the Grant Manager-secured and approved subaward, amendments, budget, statement of work, and required federal award information
Monitoring	Monitoring plan, copies of reports and deliverables used as evidence, meeting notes, site-visit records, correspondence, and follow-up
Financial review	Invoices or payment documentation reviewed for monitoring, supporting documents requested, review notes, questioned costs, and resolutions
Audit review	Single Audit verification, relevant findings, management decisions, and corrective-action tracking
Closeout	Evidence of Grant Manager-led closeout, final reports, reconciliation, disposition records, unresolved monitoring follow-up, and closeout notice

Records Retention

The Grants Office shall retain subrecipient monitoring records for at least three years from the date Merced College submits its final financial report for the federal award, unless a longer period applies because of the federal award, agency instructions, litigation, claims, audit, unresolved findings, property requirements, or another applicable requirement.

Definitions

Contractor. An entity that provides goods or services for the College's use and normally operates in a competitive environment.

Pass Through Entity. A non-federal entity that provides a subaward to a subrecipient to carry out part of a federal program.

Subaward. An award provided by a pass-through entity to a subrecipient to carry out part of a federal award. It does not include payments to a contractor.

Subrecipient. An entity that receives a subaward to carry out part of a federal program and is accountable for programmatic decision-making and applicable compliance requirements.

Single Audit. An audit required by 2 CFR Part 200, Subpart F, when a non-federal entity meets the applicable federal expenditure threshold.

Specific Conditions. Additional requirements imposed to address risk or noncompliance, consistent with 2 CFR 200.208 and the terms of the federal award.

Related Documents

- Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards, 2 CFR Part 200
- Applicable federal award terms and agency guidance
- Merced College grant management procedures
- Grants Office subrecipient determination, risk assessment, monitoring, invoice review, corrective action, and closeout forms

Revision History

July 1, 2026: Initial effective date.

September 16, 2026: Clarified that the Grants Office supports Grant Managers and coordinates subrecipient monitoring, while the Grant Manager owns agreements, approvals, performance reporting, and closeout.