Guidelines for the Administration of County Grant Proposals and Awards

INTRODUCTION
This guideline clarifies the policies and procedures governing county grant proposals and awards.

BACKGROUND
Oklahoma State University and the Oklahoma Cooperative Extension Service are required to comply with multiple federal and state regulations, as well as OSU policy in the administration of grant funding. To ensure that we are compliant with those regulations, grant proposals and awards that meet certain criteria must be administered through DASNR Sponsored Programs. This process and the associated County Routing Questionnaire will determine if the grant proposal or and award can be administered in the county or through DASNR Sponsored Programs.

LEVELS OF FUNDING
The first criteria to consider is the monetary value of the grant proposal or award.

- **$500 or less**
  - Unless some special circumstance exists, grant proposals and awards at this level may be handled by the county staff and do not need to be submitted to the District Director for review. The County staff will be responsible for keeping and maintaining all records which would need to be made available for audit.
  - No routing questionnaire is required.

- **$501 - $2499**
  - For grant proposals and awards at this level, the county staff will be required to complete the routing questionnaire.
  - If any of the items in the questionnaire are “Yes”, then it will likely have to be administered through DASNR Sponsored Programs.

- **$2500 & over**
  - Grant proposals and awards at this level MUST be administered through DASNR Sponsored Programs for administration in accordance with University policies and procedures.

CRITERIA FOR DETERMINING REQUIRED ROUTING ACTIONS
The District Director will consider a number of criteria in determining whether the grant proposal or award should be administered within the County or through OSU. As needed, the District Director will coordinate with the DASNR Sponsored Programs office in making this determination. Some examples include:

- Federal grant awards often require compliance with a wide variety of federal regulations that are not required for private awards.
- Projects that include the purchase or use of animals or firearms often must comply with additional requirements and regulations.
- Projects that purchase equipment or hire new personnel may be more appropriately administered through OSU to clarify the ownership of the equipment or the employment obligations to the employee.
Projects that commit county staff time and effort in connection to a proposal being submitted by an external entity, such as a local school district or a local charitable organization, may be more appropriately administered through OSU.

Projects that include funding from other sources or multiple sources of funding may be more appropriately administered through OSU in order to segregate the funding into different funds.

Projects that require any significant financial billing or reporting may be more appropriately administered through OSU in order to provide appropriate, auditable financial reports.

Projects with documents that require a signature on behalf of OSU should be routed through the OSU system.

The criteria listed above are examples and not an exclusive list. District Directors may determine that certain grant proposals and awards should be administered through OSU to comply with the project requirements even though it may be less than $2,500.

PROCEDURES

The County Extension Director and District Director’s approval is required for all grant proposals and awards that exceed $500. County staff should complete the questionnaire and submit with supporting documentation to the District Director prior to submitting to the funding agency or organization. This request should be submitted to the District Director at least 10 working days prior to any submission deadline. The District Director should determine what routing actions are needed for the proposal, sign, and return the questionnaire form to the county staff. A copy should also be submitted to DASNR Sponsored Programs.

- Proposals
  
  If the District Director determines that the proposal can be administered through the County, then the proposal may be submitted to the potential funder, and the county staff will be responsible for keeping and maintaining all records which would be needed for an audit.

  If the District Director determines that the proposal should be administered through OSU, then the county staff should forward the questionnaire and proposal to the DASNR Sponsored Programs Office who will route the proposal through the University for the appropriate approvals. Once the OSU approvals are obtained, a completed OSU routing form will be transmitted to the county staff. At that time, the proposal may be submitted to the potential funder.

  Often an external entity, such as a local school district, may contact Extension Educators asking for staff participation and/or contribution of time to a grant proposal that they are preparing to submit to a potential funding agency, such as the U.S. Dept. of Education or the Oklahoma Dept. of Education. Even though the external entity is submitting the proposal, participation by county staff may often need to be treated as a “sub-proposal”. Usually, these arrangements should be formalized through a letter of commitment that describes the county’s participation in the overall project, as well as a budget for any costs that may be incurred during your participation, including staff time. These “sub-relationships” should be handled in the same manner as a direct proposal and submitted to the District Director for their review and approval.

- Grant Awards
  
  If the District Director determines that the receipt of funds can be administered through the county, then the county staff should contact the DASNR Extension Finance Office to determine the appropriate steps for the financial administration of the funds as outlined below.

  If the District Director determines that the receipt of funds should be administered through OSU, then the county staff should forward the questionnaire and the award document to the DASNR Sponsored Programs Office who will route the award through the University for the appropriate approvals. Once the OSU approvals are obtained, a completed OSU routing form will be
transmitted to the county staff. The funds will then be administered in accordance with OSU policies and procedures as outlined below.

Again, these same procedures should be followed for the receipt of any “sub-awards” from external entities, such as local school districts, who received a prime award from a funding agency, and now need to transmit a certain amount of funding to the County Extension Educator. Usually, this is accomplished through the execution of a “sub-award agreement” between the prime grant recipient and OSU. DASNR Sponsored Programs office can provide this agreement and work with your external funding entity to get the agreement in place.

- **Financial Administration:**
  
  The award of any funding that is retained and administered within the County should be established in a separate Quicken category or sub category. Such an account will be limited to receiving and disbursement funds derived only from the award and will follow the procedures that apply to the receipt and disbursement of funds in an agency account.

  For funding that is administered through OSU, a separate OSU grant fund (Ledger 5) will be established for the receipt and expenditure of the associated funds. Grant funds may have certain restrictions and these will be communicated to you from the DASNR Sponsored Programs office, or county staff may contact the DASNR Sponsored Programs office as needed when questions arise. Expense transactions should be processed through the normal procedures through DASNR Extension Finance Office, except that the appropriate grant fund code should be noted on each expense. The county staff member acting as Project Director will be responsible for monitoring all expenditures on the grant fund, for monitoring the fund status/balance, and for ensuring that all appropriate expenditures are placed on the fund in a timely manner prior to the termination of the grant.

  Grant funds are sometimes received in one lump sum payment up front which must be transmitted to DASNR Sponsored Programs Office for deposit in the appropriate grant fund. However, many granting entities do not send the funding until after the expenditures have been incurred, and they are billed to reimburse the University. Any billing or financial reporting that is required in connection with the grant will be completed by central financial offices at OSU, and should not be prepared or submitted by county staff.

**RELATED OSU POLICY**

- **OSU P&P 1-0305** – Routing System – Proposals, Grants, Contracts, and Agreements
- **OSU P&P 4-0105** – University Research