

# **NOW THAT YOU HAVE AN EC-US COOPERATION GRANT**

**Guidelines for Administering your EC-US  
Cooperation Project in Higher Education and  
Vocational Education and Training**

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Fund for the Improvement of Postsecondary Education (FIPSE)  
U. S. Department of Education

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Congratulations! As an EC-US Program grantee, you are part of a very special group. Your project has been selected for support through a very competitive grant-making process involving peer and staff reviews in the United States and in Europe. We fully expect that your work will lead to significant improvements in international postsecondary education, and that you and your American and European partners will be nationally and internationally recognized as innovators by the time your consortium project concludes. We look forward to working with you throughout the life of your project and beyond.

This guide is designed to introduce you to your responsibilities as a federal grantee, and to suggest ways in which you and the FIPSE international program staff can collaborate to serve a common goal – the success of your grant project. The information below is laid out in a question-and-answer format, and covers information you need to manage your projects effectively.<sup>1</sup> If you have questions, please contact the FIPSE program officer monitoring your grant.

## I. FIRST THINGS FIRST

### ***Whom do I contact at FIPSE when I have a question about my grant?***

Whether your question has to do with the programmatic aspects of your project or budgetary issues, your primary contact is the FIPSE program officer assigned to monitor your project. The program officer assigned to your project may or may not be the same person that you had contact with during the review and budget process. During the time of your multi-year grant period, you may be reassigned to another program officer because of personnel changes or other assignments at FIPSE. The name and contact information for your program officer may be found in item 3 on your grant award document and on the website at <http://www.ed.gov/programs/fipseec/contacts.html>

Your FIPSE staff contact is both the program officer and grants officer for your project. The only thing that your program officer cannot help you with is the actual grant disbursement process (i.e., drawing down funds from the Federal treasury to support your work.) We suggest you direct questions about that process to your institution's grants or budget office, in communication with the Department of Education's payment management system.

### ***What is the format for citing FIPSE support?***

You must cite the Fund for the Improvement of Postsecondary Education (FIPSE) as the funding source for your EC-US grant in all related publications, websites, and press releases. Also, please provide a link to the FIPSE website <http://www.ed.gov/about/offices/list/ope/fipse/index.html> on your website. The following is a

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<sup>1</sup> This document is only intended to provide guidance.

**required citation** (refer to EDGAR, 34 CFR 75.620) for any digital or print publication that contains FIPSE project materials.

**Statement for Publications and Websites:** “The contents of this (insert type of publication; e.g., book, report, film) were developed under a grant from the Fund for the Improvement of Postsecondary Education, (FIPSE), U.S. Department of Education. However, those contents do not necessarily represent the policy of the Department of Education, and you should not assume endorsement by the Federal Government.”

**Press Release Format:** Work with your institution’s public relations office to send out information on your program to local print and news media. You may use the sample format below or your institution’s template for creating a press release. When issuing statements, press releases, and other documents or announcements describing this project, you must include (under Public Law 105-78 Sec. 508):

- 1) the dollar amount of federal funds for the project;
- 2) the percentage of the total cost of the project that will be financed with federal funds; and
- 3) the percentage and dollar amount of the total cost of the project that will be financed by nongovernmental sources.

**For Immediate Release (Sample)**

DATE:

**FIPSE Awards New Grant to** *Name of Institution* **for** *Name of Project*

**Contact:** Project Director’s Name, Address, Phone Number, E-mail

WHAT: The Fund for the Improvement of Postsecondary Education (FIPSE) in the U.S. Department of Education has awarded a *amount of award* grant to *name of the institution and department* for *name of the program*. Name the percentage of federal funds used for the project, e.g. *sixty percent of total cost of the program, e.g. four hundred twenty thousand dollar project* is funded by FIPSE, with the remaining *name the percentage* funded by *nongovernmental sources*

WHEN: The *name of the program* activities begin *October 1, 2001* and end *August 31, 2004*.

DETAILS: Description of the program. Abstract used for submission would be appropriate. Be sure to list all US and European partners and the fact that the European partners are funded by the Directorate General for Education and Culture of the European Commission.

**What resources are available on the EC-US Program website?**

The program website <http://www.ed.gov/programs/fipseec/index.html> is updated regularly and contains information and forms for applying for a grant, advice for developing proposals, short abstracts on funded projects, links to other international programs, and staff contact information. A separate “For Grantees” section includes instructions for submitting first year, second year, and final performance reports, no-cost extensions, sample publication citations and press releases, and “Now that you have an EC-US grant.” You can access the main FIPSE home page and the searchable grant database from the EC-US website.

The web site is frequently revised and amended to make available the most current information for applicants and grantees. While the EC-US web site includes brief abstracts of projects, a fully searchable database of all FIPSE projects funded since 1994 is available on the FIPSE web site at <http://www.ed.gov/about/offices/list/ope/fipse/index.html> under the heading “Project Database: Search 1994--Present.” Information in this database is updated annually for all active grants.

**What are the roles of FIPSE and DG EAC?**

One of the unique features of the EC-US Cooperation Program is the close collaboration between the Fund for the Improvement of Postsecondary Education (FIPSE) and the European Commission’s Directorate General for Education and Culture (DG EAC) in issuing joint guidelines, supporting joint funding, and coordinating the monitoring of project activities and data collection. DG EAC and FIPSE staff members are in close and frequent contact and consult with each other during the application process, the selection of funded grants, and the monitoring of all active grants. Since each EC-US grant involves active partners in the US and Europe, many administrative decisions and actions include the acknowledgement and agreement of both funding agencies. FIPSE and DG EAC operate by similar but not identical procedures and deadlines. Below is a chart that outlines the operating procedures for FIPSE and DG EAC.

	<b>FIPSE</b>	<b>DG EAC</b>
Grant announcement	Grant announcement and availability of application materials are on the same day (November-January)	
Submission date	Proposals are submitted in the US and in Europe approx. 60 days after announcement date	
Funding announcement	July 15	July 15
Report cycle	Annual plus final	Interim plus final
Grants begin	October 1	October 1 (year n)
US first performance report EC interim report	July 15 (in first year)	September 30 (year n+1) for 2-year projects April 1 (year n+2) for 3-year projects
Second performance report	July 15 (in second year)	none
Final performance report	90 days after end of grant	60 days after end of grant

No-cost extension	30 days before end of grant	60 days before end of grant
Funding cycle	Annually October 1 to September 30	The totality of the grant is committed in year (n) for the duration of the project
Payments	-Annual budgets are negotiated in full at grant inception -Unexpended annual funds are carried forward automatically -Annual funds released upon approval of annual report -90 day liquidation period	- After the signature of the contract (40% for 2- and 3-year project; 80% for 1 year project) - 40% after interim report (for 2- and 3-year project) - 20% after final report (all projects)

***How do I read my grant award notification document?***

Your grant officially begins when you receive a copy of your “Grant Award Notification.” This is the document that officially commits the U.S. Department of Education to supporting your project. Two copies are mailed to each institution. One copy goes to the certifying representative (the person who signed at the bottom of your grant application’s cover sheet.) The second copy goes to the person listed as the project director.

Notifications for multi-year awards contain information about anticipated funding for future budget periods. Please review the amount of the award (item 7) and the period of the award (item 6), particularly the end date of the current budget period. The end date is tied to annual performance reporting requirements. The annual report must be submitted before FIPSE can release funds for the second or third year of any funded project.

Should any information in the Grant Award Notification differ from what you think was discussed or agreed upon, please contact your program officer as soon as possible. If you do not have a copy of the Notification, contact your institution’s finance or business office.

At the beginning of each new budget and performance period you will receive a new Grant Award Notification. In addition, you will also receive a new notification each time any administrative action is taken on your grant. Keep in mind that your most recent Grant Award Notification supersedes all previous ones. Administrative actions are sequentially numbered and located in item 5. *Project period* is the total amount of time for which your grant has been approved for work. Project periods are divided into budget periods. *Budget period* is an interval of time into which a project period is divided for budgetary purposes, usually twelve months. This means that a budget period represents a *program year*. The budget period for EC-US grants runs from October 1 to September 30. The federal *fiscal year* runs from October 1 to September 30.

### ***What are the roles of my program officer and program coordinator?***

Each of the four program officers on the FIPSE international team has served as a faculty member and administrator at institutions of higher education throughout the United States and Europe and each has also been an administrator of federal programs for a number of years. Your FIPSE program officer approaches the monitoring of your project on a collegial basis. He or she truly wants to be your partner. Your program officer will listen to your ideas and progress, brainstorm with you, and provide you with feedback and suggestions to tackle problems and issues you may encounter as you work at carrying out your project's goals and objectives. The primary goal of your program officer is to help make your project successful at your institution and throughout the nation as a model of postsecondary and international educational improvement and innovation.

Upon request, your program officer can also troubleshoot for you if you hit a roadblock within your administration, with faculty, or with other institutions or partners. He or she may advocate for you on your campus or elsewhere to help you gain increased visibility and support for your project.

Each international program administered by FIPSE (EC-US Program, North America Program, and US-Brazil Program) is directed by a program coordinator, who also serves as a program officer. Dr. Frank Frankfort coordinates the EC-US Program and is responsible for contact with DG EAC and overall administration. Your first point of contact with FIPSE is your assigned program officer, but you may also contact the program coordinator ([frank.frankfort@ed.gov](mailto:frank.frankfort@ed.gov) or 202-502-7513) for general questions about the Program, upcoming deadlines, and information about the annual meeting.

### ***What are my responsibilities under this EC-US grant?***

It is important to remember that EC-US grants are made to the applicant institution or organization, not to a particular person. The applicant institution or organization is legally responsible for the grant funds and for making it possible for the project director to complete all work as promised. The US lead partner is the person designated by the applicant institution and listed on the award documents as the FIPSE project director. When undertaking a project funded by the U.S. Department of Education, project directors must work with their own and their partners' officials to fulfill specific legal, regulatory, and programmatic responsibilities, including:

- performing all the work promised in your approved grant application;
- exercising proper stewardship of federal funds;
- complying with all legal and regulatory requirements;

- reporting all required information to the Department, including annual and final performance reports, and annual updates in the FIPSE database;
- attending the annual EC-US Partners Conference held in the United States or in Europe and being prepared each year to play an active role in the meeting;
- serving as project director and maintaining close contact with each US and EC partner;
- citing FIPSE/DG EAC funding in all public relations notices, publications, products (see format above and on the program website); and
- maintaining regular, on-going contact with the FIPSE program officer.

### ***What does FIPSE expect of me in terms of communication?***

We expect and encourage you to take very seriously your commitment to communicate the progress and results of your project. FIPSE is concerned with promoting the highest quality education for all postsecondary learners. Our investment in your project is intended to go way beyond your addressing improvements locally. FIPSE expects you to be proactive in making your project a national and international model for postsecondary education reform.

FIPSE, therefore, views your communication responsibilities in two distinct and important ways. First, you should maintain regular communication with your program officer. Second, you must make efforts to disseminate the knowledge and strategies gained from your project. Your dissemination effort should include an evaluation component, with data that proves what has worked and shows the lessons you have learned.

Communicating with your program officer: You should communicate progress, questions, and concerns with your program officer in a **frequent** and **timely** manner:

- **Frequent** means maintaining ongoing communication with your program officer at least once every two (2) months, by phone or e-mail. If your project is just getting off the ground, more frequent communication may be necessary to assure a good start and identify any problems early on. Each program officer has a direct phone line and a personal e-mail address. A staff directory is available on the FIPSE website <http://www.ed.gov/programs/fipseec/contacts.html> under the “Staff section. Your program officer will return your phone call or e-mail within one workday, whenever possible. You should be equally responsive to a message from your program officer. And, should your travels take you to Washington, DC, FIPSE staff will welcome you to our offices to talk about the latest developments in your project.

- **Timely** means that you should communicate with your program officer whenever significant issues arise in connection with your project. FIPSE's international staff has experience with dozens of funded projects and can often help you to solve problems or suggest alternative approaches to issues.

Disseminating your project: We count on your commitment to promote your project goals and accomplishments beyond your local site. We expect that you will gladly respond to e-mails and telephone calls from educators requesting information about your project, including requests for copies of your grant proposal. You should set up files of your original proposal and any progress reports so that they can be easily emailed to anyone asking for information. You should delete personal budgetary information in fulfilling such requests, but others are entitled to copies of funded proposals. We also recommend developing a website for your project so that information can be easily updated and made more accessible.

We know that responding to the requests of others for information about your project entails extra work on your part. You should use technology (Internet, e-mail, website) to maximize your efforts to let others know about your ideas, approaches, and resources. You should also make the most of telling others about your project's successes at conferences, workshops, and elsewhere. Just don't forget to share these activities with us too.

From time to time, FIPSE may also ask you for information that is needed for evaluations of federal programs. As federal officials, it is vital that we can describe our programs and projects accurately as part of our justification for future congressional appropriations. Your cooperation in this effort is much appreciated. We expect that almost all the information we may request from you will be collected in the annual reports and the final report.

### ***What else should I expect of my program officer?***

Your program officer monitors your progress throughout the term of your project. Tracking your progress begins after you receive your award. You and your program officer should discuss and mutually agree on the goals, objectives, benchmarks, and outcomes for your project, based on your approved grant application. Mutual understanding is important so you both use the same guidelines for assessing your project's progress. For EC-US program grants you will also need to outline partner goals, objectives, and outcomes.

Your program officer assesses your project's progress in various ways. He or she will:

- review independent evaluators' reports of your project;
- review annual and final performance;

- schedule face-to-face meetings with you, your evaluator, and others at the annual EC/US Project Directors' meeting, or make other arrangements; and
- visit your institution or organization to hear more from you, your students, your faculty, your administration, and others about your project's progress and to champion your goals and objectives.

### ***Who in ED is responsible for grant payments?***

As part of a system of checks and balances, the Department's functions of dealing with program, regulatory, and budget issues are separated from grant disbursements. FIPSE program officers deal with the former and grant payment specialists deal with the latter. ED's Financial Payments Group is responsible for grant disbursements and is located in an office separate from FIPSE. Together with the first Grant Award Notification, each new grantee receives instructions on setting up the payment system.

### ***What are the guidelines for drawing down funds for project activities?***

The guidelines for drawing down funds for yourself and your partners are found in Parts 74 and 80 of EDGAR, the Education Department General Administrative Regulations. For any funds that you draw from your Department of Education grant account, you must:

- draw down only as much cash as is necessary to meet the immediate needs of the grant project;
- keep to a minimum the time between drawing down the funds and paying them out for grant activities; and
- return to the Government the interest earned on grant funds deposited in interest-bearing bank accounts (except for a small amount of interest earned each year that your entity is allowed to keep to reimburse itself for administrative expenses).

In order to meet these requirements, you are urged to:

- take into account the need to coordinate the timing of drawdowns with prior internal clearances (e.g., by boards, directors, or other officials) when projecting immediate cash needs so that funds drawdown from ED do not stay in a bank account for extended periods of time while waiting for approval;
- monitor the fiscal activity (drawdowns and payments) under your grant on a continuous basis;
- plan carefully for cash flow in your grant project during the budget period and review project cash requirements before each drawdown; and
- pay out grant funds for project activities as soon as it is practical to do so after receiving cash from the Department.

Keep in mind that the Department monitors cash drawdown activity for all grants on a

weekly basis. Department staff will contact grantees who appear to have drawn down excessive amounts of cash under one or more grants during the fiscal quarter to discuss the particular situation. For the purposes of drawdown monitoring, the department will contact grantees who have drawn down 50% or more of the grant in the first quarter, 75% or more in the second quarter, and/or 100% of the cash in the third quarter of the budget period. However, even amounts less than these thresholds could still represent excessive drawdowns for your particular grant activities in any particular quarter. Grantees determined to have drawn down excessive cash will be required to return the excess funds to the Department, along with any associated earned interest, until such time as the money is legitimately needed to pay for grant activities. You can find the procedures for returning funds and interest in the ED Payee's Guide, which is located on the Web at the following URL: <http://e-grants.ed.gov/> (select the link for 'e-Payments')

Grantees who do not follow Federal cash management requirements and/or consistently appear on the Department's reports of excessive drawdowns could be:

- designated "high-risk" grantees [EDGAR 74.14, 80.12], which could mean being placed on a "cash-reimbursement" payment method (i.e., a grantee would experience the inconvenience of having to pay for grant activities with its own money and waiting to be reimbursed by the Department afterwards);
- subject to further corrective action;
- denied selection for funding on future ED grant applications [EDGAR 75.217(d)(3)(ii)]; and/or
- debarred or suspended from receiving future federal awards from any executive agency of the federal government.

Depending on which type of entity your organization is, you are urged to read either §74.22 or §80.21 of EDGAR to learn more about Federal requirements related to grant payments. If you are a state or local educational agency with a grant covered by Part 80, please check with the FIPSE program officer named in Block 3 of your Grant Award Notification to determine how to apply these requirements to any subgrantees.

## **II. PROCESSING “CHANGES”**

### ***What are the “Expanded Authorities”?***

In 1997, the Office of Management and Budget (OMB) revised some of its rules for administering federal grants, which ED adopted. These amendments to the grant administration process are referred to as the “Expanded Authorities.” In general, “Expanded Authorities” make it easier for you to make certain types of administrative changes or actions without seeking prior approval.

However, there are limits and restrictions to each type of action covered by these authorities because each may impact the scope and scale of your project. You should read carefully the guidance provided below on what you can do without prior approval and pay close attention to the list below of changes that still require FIPSE’s prior

approval. Our best advice is to call your program officer when you have doubts as to what you are permitted to do without prior approval from FIPSE.

There are four types of administrative actions covered under the “Expanded Authorities”:

- extending the project period for up to one year (no-cost extension);
- carrying funds over from one budget period to the next;
- incurring pre-award costs up to 90 days before the budget period begins (for new awards and continuations); and
- transferring funds among budget categories.

### ***Can I extend the time left on my grant?***

Yes, you can extend the project period end date *one time for a period of up to 12 months* to complete unfinished project objectives. This is called a *no-cost extension* or *time extension*. You do not need prior approval but you must notify your program officer at least 10 days (30 days preferable) before the end of your project to allow your program officer sufficient time to extend the project end date in ED’s grant management system (GAPS). For full instruction on how to process a no-cost extension see the “Guidelines for Requesting a No-Cost Extension” on the FIPSE website under the section, “For Grantees” on the EC-US home page. The request must be in writing via e-mail or hard copy, clearly stating the new end date, the reasons for the time extension, offering evidence that all partners in the project agree to continue, and providing a budget for remaining and proposed funds. Although most no-cost time extensions do not require approval, in unusual circumstances some are denied for reasons noted below.

Time extensions are *not* authorized when:

- additional federal funds are also needed;
- the scope or objectives of the project changes;
- it is merely for the purpose of exhausting unexpended federal funds; or
- it is contrary to federal statute, regulation, or grant conditions.

### ***Are unexpended funds carried over automatically from one budget period?***

Yes, funds that you did not spend are carried over from one budget period to the next without prior approval. These unexpended funds are referred to as “carryover or carry forward.” However, since large amounts of carryover may indicate a sign of trouble, you should keep your program officer informed about extenuating circumstances delaying the spending of funds in the budget period for which they were obligated.

You will need to discuss carryover when you submit your annual performance report. You must provide a written statement explaining why you were unable to spend the funds in the budget period. This usually occurs when an activity scheduled for one year is not carried out and is rescheduled for the next year, or when you spend less than budgeted in a line item but have a need for greater expenditures in that line item in the next year. Unexpended funds may be used only for allowable costs that fall within the scope and objectives of your project. These funds are drawn down in the following year before new funds are expended.

You should be aware that under unusual instances carryover could impact the amount of funds you will receive in the new budget period. In these situations, your new budget may be reduced. Sometimes there are genuine savings from a project in one budget period with an adequate budget for all the proposed activities in the following year. In these cases, FIPSE will reduce the next budget period amount by the size of the savings to use those savings to fund other program activities. Your new Grant Award Notification document reflects your new adjusted budget. Note that carryover funds are not shown on the new grant award document but are still available for draw down. You can always check your outstanding balance in GAPS.

***Can I be reimbursed for grant-related costs prior to the start of the project?***

Yes, prior approval is not required for pre-award costs incurred up to 90 days before the budget period begins. This includes both new and continuation awards. The applicant should have a reasonable expectation that it will receive a FIPSE grant. However, it is very important to remember that funds cannot be drawn down until the budget period for these funds begins and that expenditures are incurred at the applicant’s own risk in the event a grant is not awarded.

***Can I make budget transfers among line item categories?***

The answer is not a simple yes or no. The Department of Education has taken steps to make many budget transfers among line item categories much easier by no longer requiring you to get prior approval. However, there are still changes that require program officer approval. Among the budget changes that are restricted and require program officer approval are transfers involving training funds (language and mobility stipends) and transfers involving contracting out work. Small changes in your budget such as shifting a few hundred dollars between line items do not change the scope or objectives and therefore do not need to be discussed with your program officer.

Drawing down funds can be done only by the US lead institution acting as the fiscal agent for the consortium. Although there are no limits on the amount of a draw down, funds must be expended within several working days. Common sense interpretations of the regulations should guide you as to when you should discuss budget changes with your program officer. Be sure to read the section above on guidelines for drawing down funds.

### ***What changes require prior approval from a program officer?***

You must get your FIPSE program officer's approval to make the following programmatic and budget revisions to your EC-US grant:

- changing the scope of work or objective of the project, even if there is no associated budget revision requiring prior approval;
- changing a key person specified in the application or award document. Approving such change requires a written justification. You should explain the reasons for the change in personnel and present the qualifications of the proposed replacement;
- replacing the project director (i.e., US lead partner), or substantially reducing the amount of time the director would spend on the project;
- administering the project for more than three months without an approved project director;
- making a revision that would result in the need for additional federal funding;
- providing grant funds to a third party (contracting out work), unless described in the approved grant application;
- transferring substantial programmatic responsibility for your grant to a third party;
- adding international travel that was not approved in the scope or objectives of the original grant application; and
- adding the purchase of equipment not approved in the original grant application.

### ***How can I speed up my request for administrative changes?***

**You can speed your request for an administrative change by always using your**

**grant PR/Award Number.** This is the number assigned to your application when you submitted your proposal and is used throughout the life of the grant. The award number is listed in item 5 on your Grant Award Notification. The number for every EC-US grant is P116J plus 6 digits. The first two of the six digits refer to the initial funding year and the last four digits refer to the assigned application number. Use of this number is required for all correspondence since it is the only quick and accurate way we have to access your official file in our data system.

Requests for approval of grant revisions can be e-mailed to your program officer. You may also mail or fax your request to your program officer at:

U.S. Department of Education  
Fund for the Improvement of Postsecondary Education  
1990 K Street, 8<sup>th</sup> Floor  
Washington, DC 20006-8544.  
Tel: 202-502-7500 Fax: 202-502-7877.

### **III. FROM ONE YEAR TO THE NEXT**

#### ***What must I do to continue my multi-year award?***

All budgets for EC-US awards, regardless of the number of years involved, have been negotiated in full at the beginning of the grant. This means that unless there is a significant change in your scope of work, or lack of substantial progress, no changes in your budget will be made for the duration of the project.

However, the decision to award a continuation of your grant is not automatic. You must submit an annual progress report for each year of your grant.

Your program officer will use the information in the annual (and other) report(s) to decide whether you have made substantial progress to continue funding your project. He or she will also consider:

- whether you have obtained approval for changes in the project that, at no additional cost, permit the project to meet its objectives in the future; and
- whether continuation of your grant is in the government's best interests.

Should your program officer determine that you have failed to meet the above requirements (see EDGAR, section 75.253), you may be denied continued funding. In all cases your program officer will discuss with you the reasons for a discontinuation. As with all federal grants, the amount of funds allocated for continuation grants depends on annual congressional appropriations.

### ***What's expected in my annual performance report?***

Your annual EC-US performance report must contain a summary of your project's activities and outcomes since the beginning of the initial budget period, or since the submission of your last performance report. The report must include the most current performance and financial expenditure information. Performance information must relate back to the goals and objectives described in your approved grant application. For consortia grants, you should also describe the progress each partner has made towards meeting project goals, objectives, and benchmarks. You should also tell us about any educational products developed in the last year. Each year, as part of the annual report, the US lead partner must update the project description that is published on the FIPSE website. This information is entered directly into the FIPSE project database and forms the public access venue for the international higher education community

Your program officer closely reviews your annual report. When the program officer has clear indications from the report that substantial progress has been made in meeting the project's goals and objectives, the budget for the next project period is approved. The annual report is a very important document and you should carefully prepare it, detailing your activities and outcomes.

The instructions for preparing your first or second annual progress report are posted on the EC-US Program home page in the "For Grantees" section. You will receive an email reminder each year in May with a due date around **July 15**. The date will be specified in the email message and is late enough in the budget period to enable you to provide the most meaningful information about your project's accomplishments.

## **IV. CLOSING DOWN**

Your responsibility to FIPSE is only partially fulfilled when you complete your project's activities. The other important part is telling us about your project. You should put care into timely, accurate, and comprehensive reporting of your project's activities and outcomes. Your reporting becomes the basis for FIPSE's and the Department of Education's evaluation of the effectiveness of our EC-US Program, as well as our reporting to Congress, the General Accounting Office, and the public.

### ***When is the final performance report due?***

Your role in this close out process involves preparing a final performance report. Final reports are **due no later than 90 days** after your project's end date. If your project gets a no-cost time extension, the due date for the final report move back accordingly but the request for processing a no-cost extension does include a status report on the current year's activities. Guidelines for preparing the final performance report are also posted in the "For Grantees" section of the EC-US Program home page. A reminder to submit the final report will be sent to the US lead partner shortly before the project is scheduled to conclude. It is very important to write a thorough final report. Each report is read by a

program officer, who will respond to you in writing. You will need to send a final financial report (SF 272) directly to ED's Financial Payments Group, not to FIPSE.

***Can I draw down funds after the grant expiration date?***

Yes, after the expiration date there is a liquidation period of 90 days. During this time you may draw down funds to pay for expenditures incurred during the previous active grant period. You may **not** incur new expenditures during this liquidation period. At the end of the liquidation period the grant will be closed for drawdowns.

***How long must I keep grant records?***

Under the General Education Provisions Act, you must retain grant records for three years after the completion of activities for which grant funds were used. Ending a grant does not affect your legal requirement to retain all records of a grant project, nor does it affect the rights of a federal agency to have access to those records.

## **V. OTHER QUESTIONS**

***Will my grant be audited?***

Under OMB Circular A-133, if your institution expends more than \$300,000 in federal funds in a budget period, you must arrange for an independent audit for that program year. Copies of audit reports should be sent to the address given in the instructions that accompany your Grant Award Notification. Obviously your grant is audited every year as part of your institution's or organization's annual procedures.

In unusual circumstances, the Department's Office of Inspector General (OIG) may perform an audit for fiscal and program compliance. Such an audit may be initiated at the request of the FIPSE staff.

***What is EDGAR?***

EDGAR is the "Education Department General Administrative Regulations". You received a copy of EDGAR with your first Grant Award Notification. EDGAR provides you with the regulatory framework for administering your project. EDGAR's purpose is to ensure that federal funds are spent according to ED's mission and that you meet your commitments. It can be accessed online at <http://ocfo.ed.gov/grntinfo/edgar.html>

The two parts of EDGAR relevant to EC-US grants are:

- Part 74: This part provides rules for the administration of grants to institutions of higher education, hospitals, and non-profit organizations. It

includes sections on cost sharing, program income, changes requiring prior approval, annual and final reports, copyright policy, and auditing requirements.

- Part 75: This part provides more general administrative responsibilities, including rules on continuations, no-cost extensions, group applications, conflict of interest, and copyright.

### ***What are bulletins and circulars?***

Federal grant regulations written by the Office of Management and Budget (OMB) are written in documents called circulars. These can be accessed online at <http://www.whitehouse.gov/OMB/circulars/index.html>. The U.S. Department of Education's Grants Policy and Oversight Staff (GPOS) also publishes bulletins that may be accessed online at: <http://www.ed.gov/policy/fund/guid/gposbul/gposbul.html>

- OMB Circular A-21: This set of cost principles applies to educational institutions.
- OMB Circular A-122: This set of cost principles applies to non-profit organizations.
- OMB Circular A-87: This set of cost principles applies to state, local, and tribal governments.
- OMB Circular A-133: This circular outlines OMB's auditing requirements, discussed above.
- FAR (Federal Acquisition Regulation) or 48 CFR Part 31.2: This set of cost principles applies to for-profit institutions.
- GPOS Policy Bulletins. These bulletins are issued by ED's Grants Policy and Oversight Staff (GPOS). Bulletin 19 refers to the "Expanded Authorities" amendments of Part 75. Bulletin 27 refers to "Guidelines for Drawdowns."

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