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| Procedure:<br><br><b>Contracted Service<br/>Compliance Review</b> | Policy:<br><b>Contracted Services for Grant<br/>Funded Programs</b> |             | Number:<br><b>GP1700.1</b>  |
|   | ( ) Complete Revision<br>( ) Partial Revision<br>( <b>X</b> ) New   | Supersedes: | Page:<br><b>Page 1 of 2</b> |

### Overview of Procedure

An effective compliance system needs to ensure that contracts provide only services that are allowable under the terms of the grants used to fund them, and that contracts are consistent with descriptions of the services needed in competitive selection processes (if applicable) and in authorizing SRC resolutions.

### Procedure Details

The Office of General Counsel shall forward to the Grant Compliance Office (GCO) for review all non-LCA contracts (those over \$20,000) that are ready for execution but have not yet been delivered to the parties for execution. The GCO will review contracts to ensure that the terms are within the period of availability for the grant and that the services described are allowable and consistent with the authorizing SRC resolution.

### Procedure Steps

| <b>RESPONSIBLE POSITION</b>                        | <b>Step</b> | <b>ACTION TAKEN</b>  |
|--|-------------|--|
| Grant Attorney –<br>Office of General<br>Counsel   | 1           | When a contract is ready to be sent to the parties for execution, send the contract to the Grant Compliance Office for review, by emailing it to the Executive Director of the Grant Compliance Office. Include a copy of the SRC Resolution.  |
| Executive Director –<br>Grant Compliance<br>Office | 2           | Upon receipt of contract, assign appropriate Grant Compliance Monitor to review, and ensure timely completion of review.   |
| Grant Compliance<br>Monitor                        | 3           | Review the contract by (a) confirming that the dates of service for the contract are within the period of availability for the grant, and (b) checking the statement of work and cost against the SRC Resolution and RFP (if applicable) to ensure consistency. Resolve any issues with the applicable program manager.<br><br>Assuming the contract is compliant, return it to the Grant Attorney with a follow-up e-mail indicating that the contract (cite Office of General Counsel Contract Number) is compliant. |
| Grant Attorney                                     | 4           | Have the contract fully executed. If any party to the contract seeks to change the terms of the agreement prior to being fully executed, ensure that the Grant Compliance Office reviews and approves the changes prior to execution.<br><br>Once contract is fully executed, forward executed copy to Title I Compliance Assistant in the Grant Compliance Office for inclusion in database of scanned compliance documents.  |

**Policy**

- *GP1700: Contracted Services for Grant Funded Programs*

**Forms**

**Definitions**

**Contacts**

- *Office of General Counsel*
- *Grant Compliance Office*

**Frequently Asked Questions**

**Related Information**

**History**

**Amended:**

- Amended 5/7/13 to clarify Grant Compliance Office review process.
- Amended 9/23/13 to reflect change in limited contract threshold and to clarify process for inclusion of executed copies of contracts in Grant Compliance Office database.
- Amended on 5/8/2015 to make technical adjustments.

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| Issue Date:<br>July 1, 2012 | Effective Date:<br>July 1, 2015 | Approved by:<br>Chief Grant Development and Compliance Officer |
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