

# **Title III Policies and Procedures Manual**



**Tuskegee University  
Tuskegee, Alabama**

**TUSKEGEE UNIVERSITY**



**TITLE III PROGRAM  
POLICIES AND PROCEDURES MANUAL**

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## FOREWORD

Within Tuskegee University's Business and Finance department, there is an organized Office of Grants and Contract Accounting. A Grants Specialist will be assigned to the Title III accounts. This office oversees the management and accounting for all grant and contract funds for Tuskegee University.

When the grant award document is received in the Office of Sponsored Programs, staff members are responsible for the following: 1) developing the appropriate budget lines according to guidelines, 2) preparing the Budget Adjustment Request (BAR) Form for appropriate signatures by University officials, 3) notifying the Title III Director/Coordinator of the approved BAR, and 4) submitting a copy of the approved budget, fiscal reporting forms and any grant terms or conditions that apply, to the Title III Director/Coordinators and the Office of Grants and Contract Accounting.

Requests for expenditures are initiated by Activity Coordinators, reviewed by the Title III Coordinators and approved by the Title III Director and then screened by the Grants and Contract Accounting Office for availability of funds and appropriateness under the grant. The Office of Grants and Contract Accounting keep an up-to-date line balance on each grant to avoid exceeding allowable costs. Financial reports are prepared in this office and assistance is given to the Title III Coordinators. The Title III Director signs all commitment documents, making sure the account number and proper purchasing code are shown. The University fiscal officer follows long-established procedures for procurement, payment, and fiscal accountability. Tuskegee University's accounting system follows the format developed by the National Association of College and University Business Officers as confirmed by the audit guide for colleges and universities published by American Institute of Certified Public Accountants.

## INTRODUCTION

The Title III Strengthening Historically Black Colleges and Universities Program provides grants to Historically Black Colleges and Universities (HBCUs) to assist these institutions in establishing and strengthening their physical plants, academic resources, fiscal stability and student services so that we may continue to participate in fulfilling the goal of equality of educational opportunity. This program came to life because the President and Congress of the United States concluded that special funding should be allocated to strengthen HBCUs because it determined that:

1. Historically Black Colleges and Universities have contributed significantly to the effort to attain equal opportunity through postsecondary education for Black, low-income, and educational disadvantaged Americans;
2. States and the Federal Government have discriminated in allocation of land and financial resources to support Black public institutions under the Morrill Act of 1862 and its progeny, and against public and private Black colleges and universities in the award of Federal grants and contracts, and distribution of Federal resources under this Act and other Federal programs which benefit institutions of higher education;
3. The current state of Black colleges and universities was partly attributable to the discriminatory action of the states and the Federal Government and this discriminatory action requires the remedy of enhancement of Black postsecondary institutions to ensure their continuation and participation in fulfilling the Federal mission of equality of educational opportunity; and
4. Financial assistance to establish or strengthen the *physical plants, financial management, academic resources, and endowments* of Historically Black Colleges and Universities were appropriate methods to enhance these institutions and *facilitate a decrease in reliance on governmental financial support and to encourage reliance on endowments and private sources.*

Title III funds may be used for the purchase, rental, or lease of scientific or laboratory equipment. Also supported are the construction, maintenance, renovation, and improvement of instruction facilities. Funds support faculty exchanges and the development of academic instruction in disciplines in which Black Americans are underrepresented. Projects may support the purchase of library materials as well as tutoring, counseling, and student service programs. Also supported are funds and administrative management; joint use of facilities; establishment or improvement of development offices; establishment or enhancement of programs of teacher education; and establishment of outreach programs.

## **INSTITUTIONAL OVERVIEW**

Tuskegee University is both an independent and a state-related institution of higher education.

Undergraduate instruction at Tuskegee University is organized under seven major areas: the Andrew F. Brimmer College of Business and Information Science; the College of Agriculture, Environment and Nutrition Science; the College of Arts and Sciences; the College of Engineering; the College of Veterinary Medicine, Nursing, and Allied Health; the Robert R. Taylor School of Architecture, and Construction Science; and the School of Education. The curricula for the seven colleges currently offer 49 degrees including 35 Bachelor's, 11 Master's, a Doctor of philosophy in Engineering and Materials Science, Doctor of Philosophy in Integrative Bio Sciences and the Doctor of Veterinary Medicine.

In 1880, a bill that included a yearly appropriation of \$2,000 was passed by the Alabama State Legislature to establish a school for African-Americans in Macon County. This action was generated by two men – Lewis Adams, a former slave, and George W. Campbell, a former slave owner, who saw the need for the education of African-American youth in this rural Alabama locale.

The bill was signed by Governor Rufus Willis Cobb, and became law on February 12, 1881, thus establishing the Tuskegee Normal School for the training of African-American teachers. Further, a three-man commission was established to govern the school, and was authorized to recruit and hire a teacher.

After considerable efforts, the commissioners employed Booker T. Washington, who opened the school on July 4, 1881. Thirty men and women from Macon and neighboring counties gathered the first day to attend Alabama's first normal school for the training of African-American teachers.

In 1882, Dr. Washington contracted to buy a 100-acre abandoned plantation, which became the nucleus of Tuskegee's present campus. He began a program of self-help, which permitted students to live on the campus and earn all, or part of their expenses.

Renewing the Title III grant will ensure that Tuskegee University continues the legacy of being a viable institution of higher learning that serves the State of Alabama as well as the nation.

## **THE TUSKEGEE UNIVERSITY STATEMENT OF MISSION**

### **INSTITUTIONAL MISSION AND PURPOSE**

Tuskegee University is a national, independent, and coeducational institution of higher learning that has a historically unique relationship with the State of Alabama. The University has distinctive strengths in the sciences, architecture, business, engineering, health and other professions, all structured on solid foundations in the liberal arts. In addition, the University's programs focus on nurturing the development of high-order intellectual and moral qualities among students and stresses the connection between education and the leadership Americans need for highly trained leaders in general, especially for the work force of the 21<sup>st</sup> Century and beyond. The results we seek are students whose technical, scientific and professional qualities have been not only rigorously honed, but also sensitively orientated in ways that make the public-spirited graduates who are both competent and have a strong commitment to public service and to excellence.

The University is rooted in a history of successfully educating Black Americans to understand themselves against the background of their total heritage and the promise of their individual and collective future. The most important of the people we serve are our students. Our overall purpose is to nurture and challenge them to grow to their fullest potential. Serving their needs is the principal reason for our existence. And a major outcome we seek is to prepare them to play effective professional and leadership roles in society and to become productive citizens in the national and global community. Tuskegee University continues to be dedicated to these broad aims.

Over the past century, various social and historical changes have transformed this institution into a comprehensive and diverse place of learning whose fundamental purpose is to develop leadership, knowledge, and service for a global society. Committed deeply to academic excellence, the University admits highly talented students and challenges them to reach their highest potential. The University also believes strongly in equality of opportunity and recognizes that exquisite talent is often hidden in students whose finest development requires unusual educational, personal and financial reinforcement. The University actively invites a diversity of talented students, staff, and faculty from all racial, religious and ethnic backgrounds to participate in this educational enterprise.

### **SPECIAL ELEMENTS OF THE UNIVERSITY'S MISSION**

#### **Instruction:**

- We focus on education as a continuing process and lifelong endeavor for all people.
- We provide a high quality core experience in the liberal arts.

- We develop superior technical, scientific, and professional education with a career orientation.
- We stress the relationship between education and employment, between what students learn and the changing needs of a global workforce.

**Research:**

- We preserve, refine, and develop further the bodies of knowledge already discovered.
- We discover new knowledge for the continued growth of individuals and society and for the enrichment of the University's instructional and service programs.
- We develop applications of knowledge to help resolve problems of modern society.

**Service:**

- We serve the global society as well as the regional and campus community and beyond through the development of outreach programs that are compatible with the University's educational mission, that improve understanding of community problems, and help develop relevant alternative solutions.
- We engage in outreach activities to assist in the development of communities as learning societies.

**LAND GRANT MISSION**

The above three element of mission, together with certain acts of the United States Congress and the State of Alabama, define Tuskegee University as a land grant institution. Originally focused primarily in agriculture, the University's land-grant function currently is a generic one that embraces a wide spectrum of liberal arts, scientific, technical, and professional programs.

All departments, administrative units, and support functions are unrelenting in implementing the strategies aimed at achieving the mission of Tuskegee University.



## **GOVERNANCE, LEADERSHIP AND ORGANIZATION OF THE COLLEGE**

Tuskegee University is a State-related, independent, nonprofit institution of higher education that has a special and unique relationship with the State of Alabama. Established initially in 1881 by the State Legislature as a fully publicly controlled institution, the University became quasi-public and independent in 1892. The Board of Trustees establishes the governance and organization pattern of the University. It is the legally empowered entity to develop policies, resources, and direction for the University. The Board of Trustees delegates to the President the authority to organize the pattern of administration, develop the faculty and the staff, and to engage in further delegations of authority to selected general and associate general officers and to the faculty of the University for the detailed administration of the University. The Board of Trustees exercises ultimate institutional authority and control and its policy statements take precedence over all other institutional statements, documents and policies. But the Board does not intrude on the prerogatives of the day-to-day operation and administration of the institution which are delegated to the President.

The structure and work of the Board are stated in the University's Charter and By-Laws. These have been updated periodically via reviews and amendments by the Board and the President, and are presented in what follows their latest form as the Tuskegee University Governance Document. According to the By-Laws:

The control and management of Tuskegee University shall be vested in a Board of Trustees of not less than seventeen or more than twenty-five members. Twenty members shall be self-perpetuating and the Governor of the State of Alabama shall appoint five.

### **Officers of the Board**

The Officers of the Board of Trustees shall be a Chair, Vice Chair, Second Vice Chair and a Secretary who shall be elected at each annual meeting for a period of one year or until their successors are elected. The Chair and Vice Chair shall be Trustees of the University, but the Secretary may or may not be a Trustee.

**SECTION I**  
**ORGANIZATION AND ADMINISTRATION OF THE PROGRAM**

**Program Coordination**

Program Administration, the executive arm of the Title III Strengthening Historically Black Colleges and Universities (HBCU) Program, will be directed by the Title III Director.

The responsibilities of the Title III Director will be to:

1. Participate in all phases of grant preparation and monitoring.
2. Monitor program progress and analyzing any deviation of program progress and program plans in coordination with Activity Coordinators.
3. Coordination of control of budget expenditures with Activity Coordinators.
4. Serve as the liaison between the U.S. Department of Education and the University.
5. Monitor all management reports generated by Activity Coordinators to ensure compliance in accordance with program regulations and institutional policies.
6. Monitor and approve requisitions for allowed appropriations.
7. Facilitate an annual external evaluation of the Title III program and other grant programs as required.
8. Provide management with up-to-date information on the progress of the Title III program on a regular basis.
9. Maintain current and active files.
10. Maintain the department's website that provides information on all aspects of the department's operation.
11. Assess the activities of the department for effectiveness and efficiency in keeping with the department's operation plan.
12. Provide mid-year and annual reports on the attainment of goals and objectives set forth in the operational plan.
13. Ensure the implementation of best practices as it relates to grants management and compliance.
14. Maintain an organized system of documentation that demonstrates operational compliance with best practices, accreditation requirements and federal and state laws.
15. Prepare all reports as required by funding agencies and management.
16. Maintain current knowledge of the requirement and compliance issues.
17. Attend related workshops and conferences on a regular basis.
18. Manage department's operating budget.
19. Write grant proposals.
20. Travel as necessary to facilitate job functions.

Title III Coordinators will work alongside the Title III Director. The Title III Coordinators will have the following specific duties in addition to assisting the Director with their duties:

1. Assist the Director in ensuring that the operation of the TU Title III program is consistent with the goals of the overall institutional HBCU plan.
2. Serve as liaison between activity directors and the director.
3. Assist the Director in recruiting key personnel.
4. Develop, implement and operate an approved reporting system.
5. Coordinate activities to maximize the utilization of staff and other program resources.
6. Keep abreast and understand HBCU and Department of Education (DOE) policies, grant terms and conditions so that the project operates in total compliance throughout the grant period.
7. Develop guidelines for the administration of the program components.
8. Attend meetings to assess and improve the utilization of HBCU financial resources and ensure fiscal accountability; also to ensure that the University is operating in compliance to the rules and regulations governed by the Title III program.
9. Assist the Director to ensure the development of an effective internal and external evaluation system to assess program impacts.
10. Assist the director in the engagement of requested consultants
11. Develop and maintain complete files of all Title III activities, reports, and plans.
12. Maintain compliance with DOE grant and fiscal regulations, such as securing DOE approval of all contracts for the program's implementation before obligating grant funds for these purposes.
13. Coordinate fiscal aspects of the program with the campus Grants and Contract Accounting office.
14. Arrange meetings with Activity Coordinators.
15. Develop summary reports for the Department of Education to ensure completeness and compliance with guidelines.
16. Maintain contact with the activity directors to minimize problems in program operation.
17. Coordinate with the Director to execute internal and external evaluation activities.

## **Policies and Procedures**

Tuskegee University's experience in carrying out projects/grants/contracts that are funded by the Federal government, private agencies and foundations will help to ensure effective and efficient administration of this project. The following policies and procedures will be used:

1. The Tuskegee University Policies and Procedures Manual, currently in use for the Title III Program will serve as a guide. The manual gives the rules and regulations of the Department of Education (DOE) and of Tuskegee University, regarding Title III programs.

Regulations regarding fiscal control, purchasing, travel, code of conduct, procedural requirements, and additional general information are included for the optimum knowledge of project staff. Periodically, the manual is updated to include new rules and regulations and/or changes that occur within the Title III program.

2. A job description for each staff member will be required.
3. Meetings with activity coordinators will be held to plan and discuss common concerns, professional conferences, and plan evaluations (internal and external).
4. Activity coordinators will be required to submit semi-annual reports to ensure that project objectives are being met as scheduled.
5. Requests for equipment must be justified and must show how the equipment will be used in implementing the activity.
6. Travel will be closely monitored by using a written travel report form which will give details and show relevance to the project of each trip.

## **Use of Federal Funds**

The President, Vice President of Business and Finance, and the Title III Director will ensure that Title III funds will be used to supplement and not supplant or replace funds otherwise available to the institution. New personnel, employed to work with Title III funded activities or who serve as replacement faculty members for those who will be released to carry out activities funded by Title III, will be paid from federal funds. Additionally, faculty members who carry out activities during the summer will be paid by the grant without replacement costs because faculty are on academic year contracts and funds for the summer would not be otherwise available to the institution. The University uses Federal funds only to carry out projects for which funds are awarded. The Vice President of Business and Finance will ensure that Title III funds are administered in accounts separate from the regular operation of the departments administering Title III

funds. Additionally, the Title III Director will continue the practice of approving all expenditures jointly with the Grants and Contracts Accounting Office, to ensure that all expenditures are valid by audit verification.

### **Fiscal Control**

Within Tuskegee University's Business and Finance department, there is an organized Office of Grants and Contract Accounting. A Grants Specialist will be assigned to the Title III accounts. This office oversees the management and accounting for all grants and contract funds for Tuskegee University.

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## **SECTION II**

### **GENERAL GUIDELINES GOVERNING THE TITLE III PROGRAM**

General guidelines for administering the Title III Program cover internal and external reporting, budget management, program or budget revision, inventory procedures, purchases and travel regulations. The administration of the program follows the same policies and procedures established for the college at large as related to expenditures of funds. The following are, however, some requirements that are specific to the Title III Program.

#### **Internal Reports**

There are a number of internal reports that are required for each component of each Title III activity. Some of these are completed on a quarterly basis and some on a monthly basis.

Each employee, whose salary is paid in whole or in part by federal funds under the Title III Program, must submit a Time and Effort Report. These reports should be completed and approved by the supervisor of the employee, and the area vice president before it is submitted to the Title III personnel.

In addition to internal reports, the Title III Committee comprised of the Title III Director, Title III Coordinators, Activities Coordinators, and Grants Specialist are expected to hold regular meetings to discuss progress made in achieving the objectives of each activity and its various components.

#### **External Reporting Requirements**

The Secretary of Education prescribes the frequency with which performance reports are submitted. Except as provided in EDGAR 74.51 (f), performance reports are not required more frequently than quarterly or less frequently than annually. Annual reports are due 90 days after the reporting period. The Secretary may require annual reports before the anniversary dates of multiple year awards in lieu of these requirements. The final performance reports are due 90 calendar days after the expiration or termination of the award.

#### **Budget Management**

All Title III Activity Coordinators should keep a running tally of expenditures and the balances for all line items within the activity. This budget sheet should accompany each requisition submitted requesting an expenditure from the Title III budget. This continual accounting process will ensure that all parties are always aware of the status of the Title III activity.

## **Program and/or Budget Revisions**

The budget plan is the financial expression of the Title III project as approved during the award process. Each Activity Director receives a copy of the annual budget plan for the activity component that he/she manages.

Managers of all Title III efforts are required to report deviations from the budget and program plans, and request approvals for budget and program plan revision in accordance with Section 74.25 of the Education Department General Administrative Regulation (EDGAR). For non-construction awards, prior approval must be requested from ED for any of the following program or budget related reasons:

- 1) Changes to the scope of the project. The scope of the project is defined by the activities laid out in the application. (Example: Substitution the purchase of computers for hiring two retention counselors is a change in scope and requires prior approval.
- 2) Changes to the objectives of the project. Project objectives are the measurable output and outcomes. Changes in scope may also affect project objectives. Changing your original goal of training 50% of the teachers to training 35% is a change in project objective and requires prior approval.
- 3) Changes in key personnel and absence for more than three months, or a 25% reduction in time devoted to the project, both approved by the project director. Key personnel include activity directors/coordinators.
- 4) The need for additional Federal funds.
- 5) The transfer of amounts budgeted for indirect costs to absorb increases in direct costs. Or vice versa, if approval is required by the Secretary.
- 6) The inclusion, unless waived by the Secretary, of costs that require prior approval.
- 7) Transfer of funds allotted for training allowances to other categories.
- 8) Transfer or contracting out of any work.

Even though prior approval is not required, the following should be reported to the Department of Education program officer:

1. Significant delays in hiring (3 months).

2. Changes to key personnel's other duties and responsibilities (i.e. being appointed Dean).
3. Reductions or increases in the percent of time devoted to the project.

No prior approval is required for pre-award costs incurred up to 90 days before the budget period begins. There must be a reasonable expectation that the grant will be awarded; expenditures are incurred at the applicant's own risk. ED funds are not available for drawdown until the budget period begins.

No prior approval is required for a one-time extension of the project period for up to one year. The scope or objective of the project cannot be changed. This extension cannot be merely for the purpose of exhausting in expended funds. ED must be notified of planned extension no later than 10 days before the end of the project period.

Budget transfers among direct cost categories may not exceed 10% of the total budget. Unobligated fund balances are carried forward automatically to subsequent funding periods.

### **Purchasing**

The University's standard requisition form is used to initiate expenditures from the Title III budget. A sample of this form is presented in Appendix A. The requisition should include a description of the items or services to be purchased, the total amount requested, the account number, and a justification for the purchase. In the justification, the goal and specific objective to be addressed by the purchase should be listed.

Important also to the purchasing process is some form of cost or price analysis that must be made and documented in connection with every procurement action. The price analysis is also attached to the requisition. It may be accomplished in various ways, including comparison of prices, quotations submitted, market prices and similar indicia, together with discounts. Cost analysis is the review and evaluation of each element of cost to determine if reasonable, allocable and allowable.

***Title III requisitions must be sent to the Title III Office for programmatic and financial review prior to sending to the Office of Grants and Contract Accounting Office.*** If all is correct and funds are available, the requisition is approved by the Title III Director and sent to the Office of Grants and Contract Accounting office for further processing in accordance with the University's policies and procedures. If the requisition is inaccurate programmatically or financially, the inaccuracies are noted to the request so that corrections, if possible, can be made.

Also, any personnel paid from Title III funds are appointed using the University's standard personnel action form. The Title III Director must sign all personnel action forms as well.



## **Equipment and Inventory Control**

Title III equipment acquired by the College is vested in the institution subject to the college meeting the conditions for such acquisitions. The University must use the equipment in the project or program for which was acquired as long as needed, whether or not the project or program continues to be supported by Federal Funds. When no longer needed for the original project or program, the University may use the equipment in connection with other federally-sponsored activities.

The University's inventory/property management system must adhere to certain standards in order to account properly for equipment purchased with Federal funds. Equipment records must be maintained accurately and must include, at a minimum, the following information:

- 1) a description of the equipment
- 2) Manufacturer's serial number, model number, Federal stock number, national stock number, or other identification number.
- 3) Source of the equipment, including the award number.
- 4) Whether title vested in the University or the Federal Government.
- 5) Acquisition date (or date received, if the equipment was furnished by the Federal Government) and cost.
- 6) Information from which one can calculate the percentage of Federal participation in the cost of the equipment (not applicable to equipment furnished by the Federal Government).
- 7) Location and condition of the equipment and the date the information was reported.
- 8) Unit acquisition cost.
- 9) All pertinent information on transfer, replacement, or disposition of the equipment.

The Federal Government requires that a physical inventory of equipment be taken and the results reconciled with the equipment records at least one every two years. Any differences between quantities determined by the physical inspection and those shown in the accounting records must be investigated to determine the causes of the differences. The College will, in connection with the inventory, verify the existence, current utilization and continued need for the equipment.

The Federal Government further stipulates that a control system must be in effect to ensure adequate safeguards to prevent loss, damage, or theft of the equipment. Any loss, damage, or theft of equipment shall be investigated and fully documented. The Federal Government also stipulates that adequate maintenance procedures must be implemented to keep the equipment in good condition.

The purchasing of equipment and supplies using Title III funds will follow the same procedures stated for all University purchases. Refer to the *Employee Handbook* for specific policies and guidelines.

### Travel

Travel costs include expenses for transportation, lodging, registration fees, and per diem incurred by employees who are in travel status on official business of the University. Trips must be justified and in accordance with University and Title III guidelines. Travel must be **approved** by using the Travel Request Form.

Requests for travel using Title III funds will be made in the same fashion employing the same procedures and forms that are used for other College travel. All expenditures associated with the travel must have prior approval. Title III paid travel will be identified by the account number and the signature of the Title III Director. After travel is completed, a Travel Expense report along with a Faculty Development Report which is an overall assessment of the usefulness and relevance of the travel activity and how the results will be used to make job related improvements must be submitted to the Title III Office before reimbursement can be made to the traveler. Sample copies of the University's travel requisition and travel reimbursement forms are presented in Appendix A. The same institutional policies and procedures in effect for all official University travel will be used for travel that is paid with Title III funds. See the Faculty/Staff Handbook for specific details about the travel policies.

In addition to filing the customary travel documents, Title III travelers will be requested to complete the faculty members' current curriculum vita and include it with the Travel Request Form. This is a questionnaire that will describe the program in which the traveler participated: The Title III activity, department goal and objective that will be met as a result of participation; the overall benefit for the University as a result of participation. This questionnaire is located on page 2 of the Title III Travel Request Form.

### **CONCLUSIONS**

The Title III Comprehensive Development Plan and the activities outlined therein are a logical extension of the goals of the University, and in a larger sense, the mission of the institution. The University's current commitment to planning and assessment will be reflected in the administration of the Title III Program. Evaluation strategies will include measures that assess not only the outcomes and achievement of the program, but also the cost effectiveness of each activity.

Ultimate responsibility for the appropriate administration of the Title III program rests with the President and the Title III Director. The Title III program is intended and designed to integrate into the established administrative and academic operations of the College.