GRANT Development Manual

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**HISTORY**

In 1998, the MCCC Board of Trustees passed a Resolution of Intent to Establish The Foundation at MCCC and designated it as the enrichment and development organization of the College stating that all solicitations for and administration of gifts, grants, bequests and donations for College scholarship and enrichment programs and other purposes be carried out by The Foundation for and on behalf of the College.

In 2005, the President instructed the Director of Institutional Advancement to actively pursue public and private grant opportunities for the benefit of the College and its students. At that time, the Coordinator of Alumni and Resource Development participated in the Council for Resource Development Specialist Training Program to learn about the grant proposal development process from a community college perspective and how to establish a grants office. In July of 2005, the MCCC Grants Office submitted its first Federal proposal to the U.S. Department of Labor. Since that date, the Grants Office has coordinated the submittal of 78 proposals for which the college has successfully been awarded over $5.77 million (7/20/11).

Among those successful proposals was a U.S. Department of Education Title III Strengthening Institutions Grant to increase capacity to develop grant proposals and major and planned, and annual gifts. At that time, the Coordinator of Alumni and Resource Development’s position changed to that of the Coordinator of Grants and Major Gifts and was charged with submitting a minimum of 20 grant proposals per year by grant end in 2014. As part of the Title III grant, a Grant Accountant position was created and filled in year two of the grant activity and is responsible for the oversight of budget compliance and financial reporting for Federal, state and local grant programs.

As part of its capacity building activities, the Grants Office has created the MCCC Grant Manual as a guide to help faculty and staff in the development of grant proposals to public and private sources. It is a dynamic working document and is subject to change. If you have questions at anytime, please contact Eric Slough in the Grants Office at (734) 384-4111 or via email at eslough@monroeccc.edu.
GLOSSARY

**Agency Liaison**: Person designated to speak directly to granting agency on behalf of MCCC.

**Authorized Organization Representative (AOR)**: A person designated in the Grants.gov system, by the MCCC Grants Office, that serves to safeguard the College from individuals who may attempt to submit grant application packages without permission.

**Boilerplate**: Detailed standard wording about MCCC.

**Budget Monitoring**: The process used to ensure that grant funds are used in the manner intended by the funder.

**Designate**: A person selected to serve on behalf of someone else.

**Director of Marketing**: The person at MCCC responsible for all marketing activities.

**Drawdown of Funds**: The process used to access grant monies from public agencies.

**External Funding**: Financial resources secured outside of levied taxes, state funding, and tuition.

**Evaluation Plan**: The process identified by which a grant project will assess its effectiveness and outcomes.

**Fiduciary**: The entity designated as the recipient and manager of grant funds.

**Grant Accountant**: The person responsible for the oversight of budget compliance and financial reporting for Federal, state and local grant programs.

**Grant Accounting**: The system responsible for setting up, tracking, maintaining, auditing, and reporting on grant funds.

**Grant Agreement**: A contract between the grantor and the grantee outlining the roles, responsibilities, financial management, and reporting requirements of a grant project.

**Grant Coordinator**: The person responsible for preparing and submitting all proposals and grant applications in support of MCCC’s ongoing needs and priorities.

**Grant Proposal Planning Form**: A required form outlining the project, its timeline, the amount being requested and how the project addresses the MCCC Mission and Strategic Plan – which authorizes the submission of a grant application.

**Grant Proposal Planning Team**: All persons involved in the development of a grant proposal.

**Grant Research Request Form**: A form identifying a funding need and initiating the research for a potential funding source(s).
**Grantor**: The entity from which funds are granted.

**Institutional Review Board**: A group responsible for the review, determination, approval, direction of modifications, and/or disapproval of grant activities that contain or may contain research related to the use of human subjects.

**Mission**: A written statement guiding the actions and overall goals of the College.

**Office of Record**: The office in which all pertinent information relating to grant proposals and projects are kept.

**Point of Contact**: The person assigned to the College’s Data Universal Number System (DUNS) number on the Central Contractor Registry.

**Private Funding**: Monies that come from non-governmental (public) sources.

**Program Officer**: The person who serves as the funder’s program liaison and representing their interests in program implementation.

**Project Administrator**: The College administrator to which grant project staff report.

**Project Director (aka Project Coordinator)**: The person designated in the grant proposal as responsible for grant project implementation, reporting and outcomes assessment.

**Project Idea**: A new concept or way of delivering services to help meet the Mission of MCCC.

**Proposal**: The completed grant application including the budget and required forms.

**Proposal Development**: The process through which a project idea is transformed into a proposal.

**Proposal Submission**: The process through which a proposal is delivered to the funder.

**Public Funding**: Monies that come from state, Federal and local governmental agencies.

**Request for Proposal (RFP) aka Request for Application (RFA) aka Solicitation for Grant Application (SGA)**: An open solicitation to which applicants can apply for specified program/project support.

**Stakeholder**: Someone who has an interest in the implementation and outcome of a project.

**Strategic Plan**: In support of the College’s Mission, it provides the roadmap for future direction.

**Supplanting**: Seeking or using grant funds to relieve financial commitments the College is currently making in order to sustain a program.
**Sustainability Plan:** The plan by which a grant funded program will continue after funding ends.

**Training Session:** Education or instruction on a particular topic or topics.

**Workshop:** A seminar, discussion group, or the like, that emphasizes exchange of ideas and the demonstration and application of techniques, skills, etc.
SECTION I: GRANTS OFFICE

The Grants Office is located within the Office of Institutional Advancement and The Foundation at MCCC within the Audrey M. Warrick Student Services/Administration Building.

Its purpose is to support the College in securing external funds from public and private organizations. Support is offered for securing funds that will assist in achieving MCCC’s Mission and Strategic Plan. The office supports initial planning, funding research, proposal writing, proposal submission, award notification publicity activities, and grant accounting support.

<table>
<thead>
<tr>
<th>Support Services Provided by the Grants Office</th>
</tr>
</thead>
<tbody>
<tr>
<td>The following is a list of services provided by the Grants Office. It is not an exclusive list and may differ depending on the project.</td>
</tr>
</tbody>
</table>

**Accountability – Pre-Award**
Provide advice to faculty and staff to ensure funds being requested are in accordance with the guidelines provided by the funder, and ensures alignment with MCCC policies and procedures.

**Agency Liaison**
Contact Federal, state and local sources for funding information and discussion of project priorities and interests.

**Agenda**
Help plan, develop, and implement the annual grant development agenda for the College based upon the Strategic Plan priorities, strategies and tactics.

**Budget Assistance**
Assist with preparation of budgets and budget justification/explanations for contract and grant proposals.

**Collaboration**
Represents MCCC interests in collaborative grant proposals with other educational institutions, non-profits, corporations, governmental entities, etc.

**Consultation**
Provide advice on planning projects, consult with faculty and staff on content and design of the proposal and identify funding sources.

**Evaluation**
Provide information on and aid in the development of evaluation plans for inclusion in grant proposals.
Facilitation
Provide assistance in facilitating meetings for internal grant projects or ones that have multiple organizations involved as partners.

Liaison
Serves as a liaison with Federal, state, and local program officers, private associations, and foundations conducting proposal development processes. Also serves along with the Vice President of Administration as the Point of Contact (POC) for all Federal proposals submitted through www.grants.gov approving all Authorized Organization Representatives (AOR). Currently the only approved AOR’s serve as vice presidents for MCCC.

Materials/Information Dissemination
Provide information about funding opportunities, proposal development tips, policies and procedures related to grants, grant terminology, grant management, and other grant-related topics.

Project Development
Coordinate internal meetings with faculty/staff to discuss guidelines, generate ideas, design projects, and assist in writing sections the proposal.

Proposal Assistance
Provide general information on proposal writing and RFP/RFA (Request for Proposal/Request for Application) guidelines; provide general descriptive information for inclusion in proposals (Boilerplates); prepare budgets; edit proposals; complete forms; make copies; coordinate delivery of proposals to funding agencies; and submit proposals.

Proposal Submission
Submits all grant proposals on behalf of the College to grantors.

Research
Perform on-line and other research to identify new and promising public and private external funding opportunities.

Records
Serve as the office of record for all grant files, reports, databases, and resource materials pertinent to grant activities including that of proposals submitted on behalf of or in partnership with the College.

Training
Provide or arrange workshops/training sessions, upon request, on the grants process and proposal preparation for faculty and staff.
Services Provided by the Grant Accountant

The following services are provided by the Grant Accountant with regard to budget compliance and financial reporting of Federal, state and local grant funds.

- Coordinating and monitoring activity related to grants with applicable auditors and other governmental agencies
- Design and produce financial reports, models, and program analysis as requested; developing, preparing, and submitting various mandated financial reports to public and governmental agencies
- Coordinate internal reviews of grant programs
- Coordinate and monitor the annual independent audit of grants
- Provide training to internal staff involved in grant or contracted programs to ensure compliance with applicable regulations and accounting theories and practices

Services the Grants Office Does Not Provide

The following services are NOT provided by the Grants Office and are functions of the project manager and the administrator to whom they report.

Accountability – Post-Award
Working with the Grant Accountant to ensure funds awarded are being spent in accordance with the grant agreement with the funding source as well as alignment with MCCC policies and procedures.

Grant Project Direction/Coordination
Implementation and overall coordination of the grant activity including but not limited to adherence to the timeline, working toward completion of outcome objectives, completion of needed quarterly and annual reports, and serving as liaison between the grant project and grantor program officer.

Grant Project Administration
Provide administrative oversight to ensure that activities outlined in the grant are being completed, that the grant is operating on schedule, within budget and that reports are submitted on time. If grant activities are not progressing, this person ensures that a review is conducted and alternatives are discussed with the project coordinator and program officer.

SECTION II: PROPOSAL DEVELOPMENT

Faculty and staff are encouraged to seek grant funding for projects that meet the Mission and align with the College’s Strategic Plan priorities, strategies and tactics. The Grants Office will assist you with your projects. Below is the process for grant proposal development.
Note: Grant funding is meant to initiate **new and innovative** ideas that would not otherwise be funded by the College in part or in whole due to a lack of resources in the near future. **Supplanting** is when grants are sought to relieve financial commitments the College is currently making in order to sustain a program. This is **not** allowed by any publicly funded grantor as well as most private grantors.

**Step 1:** Review your project idea with your supervisor and seek their approval to contact the Grants Office for assistance in seeking grant funding.

**Step 2:** If a funding source is not known, complete a Grant Research Request Form (Appendix A), which will provide information to aide in researching a funding source.

If a funding source is known, meet with the Grants Office to validate the source with the project. Complete a Grant Proposal Planning Form (Appendix B) and acquire all necessary signatures before proceeding with the proposal development.

**Step 3:** Invite stakeholders to serve on grant proposal planning team (if necessary).

**Step 4:** Complete and submit Institutional Review Board Request for Review Form (Appendix C). *This form is in a beta version and will need to be approved by the IRB.*

**Step 5:** The Grants Office will review the grantor’s Request for Proposal and create a proposal outline assigning sections of the narrative, timeline, evaluation and budget to planning team members with appropriate deadlines for submitting drafts and final information to the Grants Office.

a) During the proposal development phase, it is essential that careful thought and consideration be given to the plan and timeline for grant activities that are working toward the achievement of the objectives for which funding is being sought. Most, if not all, funders require adherence to the timeline by which outcomes are predicted to be met as well as reporting on those objectives. A sample objective timeline is as follows:

<table>
<thead>
<tr>
<th>Activity</th>
<th>Person Responsible</th>
<th>Objective</th>
<th>Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>High school juniors will participate in ACT test preparation course.</td>
<td>Project Director</td>
<td>80% of high school juniors will achieve a composite score of 20 or higher on the ACT.</td>
<td>October 2011.</td>
</tr>
</tbody>
</table>

Outcome: 75% of program participants will become competent in the use of computer-based instructional technology.
20 terminal Computer lab for program participants established.

Project Director and Information Services

75% of program participants will complete introduction to computer based instructional technology.

By the end of the second quarter of the first year of the grant activity.

*Note: these outcomes are just for demonstration purposes and are not from any grant submitted by MCCC.*

<table>
<thead>
<tr>
<th>Step 6:</th>
<th>The Grants Office and project administrator will submit the grant budget (see section III) to the Grants Accountant for review and approval by the Business Office. Note: Any projects requiring a sustainability plan that will utilize College funds after the grant project is completed must seek formal approval by their respective Vice President and the Vice President of Administration before submittal.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Step 7:</td>
<td>The Grants Office will complete all necessary Federal and state forms and/or proof of 501(c)3 paperwork (if applicable) and assemble the formal proposal package.</td>
</tr>
<tr>
<td>Step 8:</td>
<td>The Grant Office will formally submit all grant proposals (unless otherwise permitted) to the grantor. Note: Submission of Federal proposals follows a very strict process that can be extremely time-consuming. Therefore, all Federal proposals will be submitted at least two days in advance of the submission deadline.</td>
</tr>
<tr>
<td>Step 9:</td>
<td>The Grants Office will supply members of the proposal team copies of the final proposal and will maintain the official copy.</td>
</tr>
</tbody>
</table>

**Consortium Applications:** When partnering with a consortium on a grant project for which MCCC is not the fiduciary (lead applicant), the steps above must still be followed where applicable including all necessary paperwork and approvals.

**SECTION III: HOW TO DEVELOP A GRANT BUDGET**

The grant budget can often be the most difficult and frustrating section to create when developing a proposal. When possible, it is recommended that a preliminary budget be developed at the beginning of the process as it will drive the types of activities that are proposed. Specifically, if the activity will include the hiring of personnel, completion of that line item first, to determine the remainder of the budget, is recommended.

All grantors have specific definitions for allowable costs and their respective budget line items. It is important to become familiar with the RFP to determine what those items are. The following guidelines have been established for some of the common budget line items.
**Personnel:** Adherence to the MCCC policies and procedures for hiring and established salary schedule(s) is required. The cost for personnel is determined using the following categories with formulas obtained from the business office on an annual basis. If the grant budget is for more than one year, the personnel costs are built with projected increases obtained from the business office for each of the categories. Note that MCCC considers full-time to be 30 hours or more and the only item not calculated for part-time work is health insurance.

**Personnel Cost Example**

Project Director: 1 FTE @ 12 months per year, Administrative Grade IV Step 3 with 3% salary increase projected each subsequent year.

<table>
<thead>
<tr>
<th>Item</th>
<th>Year 1</th>
<th>Year 2</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Wages</td>
<td>69,029</td>
<td>71,100</td>
<td>$140,129</td>
</tr>
<tr>
<td>FICA (.0765)</td>
<td>5,281</td>
<td>5,439</td>
<td></td>
</tr>
<tr>
<td>LTD/Life (.0072)</td>
<td>497</td>
<td>512</td>
<td></td>
</tr>
<tr>
<td>RET (Y1:.2446, Y2:.27)</td>
<td>16,884</td>
<td>19,197</td>
<td></td>
</tr>
<tr>
<td>Health (Y2: +.12)</td>
<td>14,702</td>
<td>16,466</td>
<td>78,978</td>
</tr>
</tbody>
</table>

**Equipment:** For Federal proposals, equipment is defined as any single item costing $5,000 or more. Other grantors may define equipment differently and their guidelines must be followed. It is recommended that more than one quote be secured with supporting paperwork during the grant budget development with the understanding that if funded purchasing procedures for MCCC and the grantor (if applicable) must be followed.

<table>
<thead>
<tr>
<th>Item</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Computer server</td>
<td>$10,000</td>
</tr>
<tr>
<td>Colleague Advancement Base Solution</td>
<td>$13,200</td>
</tr>
</tbody>
</table>

**Travel:** Request for travel funding must follow the grantor’s guidelines and will include Transportation (subway, taxi, car), Airfare, Lodging, Meals, and Registration fees if applicable.

**Travel Cost Example**

<table>
<thead>
<tr>
<th>National ABCD Conference 2011</th>
<th>T</th>
<th>A</th>
<th>LM</th>
<th>R</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>$75</td>
<td>$400</td>
<td>$960</td>
<td>$500</td>
<td>$1,935</td>
</tr>
</tbody>
</table>

**Supplies:** For Federal proposals, a supply is defined as any single item costing less than $5,000. Other grantors may define supplies differently and their guidelines must be followed. It is recommended that more than one quote be secured with supporting paperwork during the grant budget development with the understanding that if funded purchasing procedures for MCCC and the grantor (if applicable) must be followed.
### Supplies Example

<table>
<thead>
<tr>
<th>Item</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>PLATO (30 licenses @ $1,650 ea)</td>
<td>$49,500.00</td>
</tr>
<tr>
<td>ABE/GED Tests, Books, Supplies (200 @ $70/ea)</td>
<td>$14,000.00</td>
</tr>
<tr>
<td>Hideaway Computer Workstations (24 @ $783 ea)</td>
<td>$18,792.00</td>
</tr>
<tr>
<td>Chairs (24 @ $122 ea)</td>
<td>$2,928.00</td>
</tr>
<tr>
<td>Consumable Office Supplies</td>
<td>$475.00</td>
</tr>
</tbody>
</table>

**Total**: $85,695

### Contractual: Budget items that provide a temporary service such as consulting would be included under this category.

### Contractual Example

<table>
<thead>
<tr>
<th>Item</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Major gifts consulting (x 2 years)</td>
<td>$30,000</td>
</tr>
<tr>
<td>Datatel consulting for advancement implementation (x 2 years)</td>
<td>$15,000</td>
</tr>
</tbody>
</table>

**Total**: $45,000

### Other: Items included in this category would reflect allowable costs that did not fit in any other category.

### Other Example

<table>
<thead>
<tr>
<th>Item</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Duplicating and printing based on typical office DP budget at MCCC</td>
<td>$500</td>
</tr>
<tr>
<td>ABC Membership Dues</td>
<td>$1,650</td>
</tr>
</tbody>
</table>

**Total**: $2,150

### In-Kind: Any good or service that is being provided by MCCC or other project partner.

### In-Kind Example

<table>
<thead>
<tr>
<th>Item</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Project Administration (wages at .05 FTE)</td>
<td>$2,500</td>
</tr>
<tr>
<td>Project Administration (fringes at .05 FTE)</td>
<td>$900</td>
</tr>
<tr>
<td>Bussing for student trips</td>
<td>$3,000</td>
</tr>
</tbody>
</table>

**Total**: $6,400

### SECTION IV: HOW TO COMPLETE APPENDIX A, B and C

**Appendix A - Grant Research Request Form:** This form is fairly self explanatory. Please provide as much detail as possible. For example, please do not list “to improve MCCC’s math program” but rather indicate that you would like to “secure funding for curriculum development and program implementation to better engage students from low socio-economic, first generation college backgrounds, in college level algebra and help them to persist to calculus.” Please also
indicate other needs for the program implementation such as specific software licenses, number of computers needed for a lab, etc.

Timing is very important in researching grant funds. Sometimes the best idea may take more than a year to find a funding source to which an application can be submitted. It is not a best practice to submit a Grant Research Request in the spring for a program needed in the fall.

**Appendix B - Grant Proposal Planning Form:** This form is used once a funding source has been located and **must** be completed at the beginning of an application phase. The Grants Office will not submit a grant application for a project that does not have a fully executed Grant Proposal Planning Form.

Please especially note the section asking if other MCCC departments will be affected. For example, if you are requesting a computer lab; have you discussed the potential installation and maintenance needs with the Information Systems Department or the potential need for new electrical drops with the Maintenance Department?

All forms must include a one-page attachment including goals and objectives, an overview of planned activities, and the Mission and Strategic Plan priority/strategies being addressed by the proposal.

Signatures indicating approval on the form should be acquired in the order in which they are numbered on the form.

**Appendix C – Institutional Review Board Request for Review Form:** *This form is in a beta version and will need to be approved by the IRB.*

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**SECTION V: POST-AWARD GRANT MANAGEMENT**

If a Federal grant is secured, either the President or Office of Institutional Advancement will receive a telephone call from our congressional office announcing the award. State and privately funded grant award notifications are typically made to the project administrator or the Grants Office. The Grants Office does not manage grants during the implementation phase. It is the responsibility of the department or office receiving the grant to comply with the grant implementation plan any appropriate rules and regulations governing the grant program and with any and all reporting requirements of the grant.

**Step 1:** The Grants Office will initiate a request to the Director of Marketing for publicity announcements regarding grant funding if appropriate.

**Step 2:** Upon formal notification of the grant award (letter or contract received), the project administrator will initiate a meeting with the Grant Accountant and business office to establish college account numbers for grant deposits and expenditures and outline areas
of responsibility for reporting requirements and accountability. A complete copy of the grant will be provided to the Grant Accountant (and other appropriate areas).

**Step 3:** The project administrator (or their project director designate) will establish contact with the Federal or state agency program officer (if applicable) and attend any necessary orientation meetings.

**Step 4:** All quarterly, annual and final reports will be submitted by the project administrator or project director with a full copy provided to the Grant Office. Reports that include financial information **must** be reviewed with the Grant Accountant prior to submission.

**Guideline 1:** All requested budget changes must be reviewed with the Grant Accountant before submittal to the Federal or state agency program officer. Requested budget changes to privately funded grants must be reviewed with the Grant Coordinator and the Grant Accountant.

**Guideline 2:** Any changes to program implementation must be reviewed with the Federal or state agency program officer. Changes to program implementation that are privately funded must be reviewed with the Grant Coordinator before being made.

**Guideline 3:** All data collection for grant outcome measures will be completed by the project administrator, the project coordinator or their designate. For grants that are eligible for reapplication (Federal TRiO programs, etc.) outcome measure data must be provided to the Grant Office.

**Guideline 4:** All grants must follow existing College policies and procedures during development and implementation phases.

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**SECTION V: FREQUENTLY ASKED QUESTIONS**

1. **Is faculty release time for proposal development allowed?**

   To date, this has not been a College approved expense; however, any requests for release time should be discussed with the appropriate dean.

2. **What is the difference between supplies and equipment?**

   For Federally funded grants, supplies are single items less than $4,999. Equipment is any single item totaling $5,000 or more. **THERE ARE NO EXCEPTIONS.**

3. **Can grant funded positions follow a salary and benefit schedule that is different from the college?**

   No, grant funded positions must follow the current salary and benefit schedule for all employee groups.
4. What does “supplanting” mean?

Use of grant funds to pay for ongoing activities already budgeted or for the usual activities assigned to a position.

5. Do I have to submit my grant request through the Grants Office?

Yes, all grant requests must be submitted through the Grants Office. Due to the highly technical nature of many proposals, large portions of grant applications will be developed by content experts but the process will still be managed by the Grants Office.

6. How do I determine what expenses are allowable?

Each request for proposal will include a section on allowable and unallowable expenses. Federal grant proposals typically must adhere to the Federal Office of Management and Budget CIRCULAR A-21 (Revised 05/10/04) Cost Principles for Educational Institutions.

7. Are the bids I secured during the proposal development process sufficient for procurement during the grant implementation phase?

All projects are required to follow the College’s purchasing policies and procedures. Federal proposals will also require that the Federal procurement process be followed post-grant award.

8. Can I change my budget after the grant is awarded?

In some circumstances, a funding agency may allow budget revisions or adjustments. It is extremely important to carefully plan your grant activity and budget accordingly during the proposal development phase (being as specific as possible). All budget changes/modifications will require prior approval by the program officer and a review by the Grant Accountant. Please see Section V Guideline 1 above.

9. Does the College have a federally negotiated indirect cost rate?

No, not at this time.

10. What is the College’s process for the federal or state draw-down of grant funding?

This is dependent upon the method/system that the applicable agency or funder is using and the specific requirements of the grant.

11. Who is responsible for monitoring the grant budget?

The project administrator or their designee are responsible for ensuring that incurred expenses are included in the budget outlined in the grant as well as ensuring that all items budgeted are expended in a timely manner and in accordance with the grant.
12. Why do I need to submit my proposal to an Institutional Review Board?

All Federal grant proposals are required to submit Supplemental Information Form 424 on which the question “Are any research activities involving human subjects planned at any time during the proposed project Period?” is asked. If the answer is yes, then exemptions according to definitions in 34 CFR Part 97 must be listed and explained in a narrative. If the answer is no, then assurances according to definitions in 34 CFR Part 97 must be listed. Furthermore, certain Federal agencies such as the National Science Foundation require these determinations of exemption and/or assurances must be decided and approved by an Institutional Review Board. Finally, requiring all grant proposals to submit to the IRB serves to protect students’ and participants’ rights in grant funded programs.