SUPPLANTING

Grant administrators shall take steps to ensure the avoidance of supplanting existing College funded expenses with grant dollars from any grant award that requires the grant to serve as a supplement to the College’s financial contributions to the activities or programs that are supported by the grant. Grant administrators shall monitor all grant expenses to ensure they are supplementary and nature and shall not allow expenses previously funded by the College to transition to grant funding without written documentation of the appropriateness within the rules or regulations of the grant. Such documentation should be retained by the grant administrator and forwarded to the Director of Accounting Services for retention in their office.

Presumption of supplanting

An Awarded Applicant may be considered in noncompliance with the supplement-not-supplant requirement if funds are used to provide services that the Awarded Applicant is required to provide under State or local law, rule, or a court order. Also, Awarded Applicant could be considered in noncompliance for any funds for any service that was previously funded with State or local funds. If a program or activity cost was funded with non-federal funds in one year and with grant funds the next year, an auditor would most likely make a presumption of supplanting. However, the Awarded Applicant then has the opportunity to rebut the presumption. In view of the current reductions in state appropriations and local tax revenues, an Awarded Applicant may be justified in funding the cost with grant funds. For a decision to allocate funds in this way, the Awarded Applicant should have two types of documented evidence that supports its action: 1. Evidence of an actual reduction in state and/or local support and/or other non-federal support. Examples of such evidence are state appropriation language or a communication from the THECB regarding a reduction in state funding. There may be similar examples relating to reduced funding from local or private sources. 2. Proof that the activity/program would be discontinued without the benefit of grant funds. (As specified in the Perkins RFA)