



# Palomar College Competitive Grant Lifecycle Monitoring Framework

## Executive Summary

Palomar College's Competitive Grant Lifecycle Monitoring describes a coordinated, risk-informed approach to supporting oversight of competitive grants from proposal through closeout. The framework is aligned with 2 CFR Part 200, Board Policy 3280 Grants, Administrative Procedure 3280 Grants, and institutional practices, and is intended to support consistent, transparent, and compliant grant management.

Each part of the framework corresponds to a stage in the grant lifecycle and includes a defined monitoring objective intended to guide coordination and assurance activities:

- Part 1 Pre-Award: Support proposal development that aligns with institutional priorities and complies with both funder and institutional requirements.
- Part 2 Award: Support the establishment of a strong and compliant operational foundation to guide grant implementation and project set up.
- Part 3 Implementation: Monitor and verify that grant-funded activities are being carried out in alignment with the approved scope of work, budget, and applicable regulations.
- Part 4 Closeout: Support the timely completion of programmatic and financial obligations, secure grant records, and document outcomes to inform future grant efforts.

The framework integrates internal controls concepts, standardizes monitoring practices through tools and rubrics, and promotes collaboration across departments. This advisory approach supports transparency, accountability, and successful grant outcomes that advance student success.

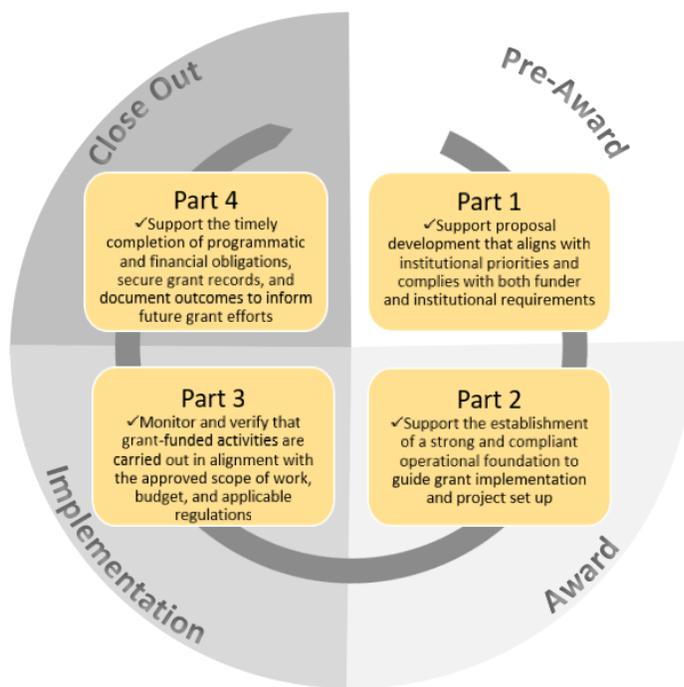
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## Introduction

Palomar College takes a proactive approach to grant monitoring, recognizing its importance in supporting well-managed projects that deliver meaningful outcomes for our students. The Competitive Grant Lifecycle Monitoring Framework offers a structured system that spans the four stages of competitive grant management: Pre-Award, Award, Implementation, and Closeout. It supports compliance with 2 CFR Part 200 and institutional policies, while fostering transparency and accountability in the administration of all competitive grants - federal, state, local, and private.

Institutional Research, Planning & Grants (IRP&G) supports each phase of the grant lifecycle. In alignment with Board Policy 3280 Grants (BP 3280), IRP&G coordinates internal reviews, supports the use of consistent processes, and monitors progress in collaboration with Fiscal Services and supervising administrators. The Grants Manager provides District-level coordination and ensures teams have access to the tools and resources needed to meet compliance requirements and implement their projects effectively.

A key feature of this monitoring framework is the integration of internal controls - the policies and procedures that help safeguard funds, maintain documentation, and support adherence to regulatory standards. In accordance with 2 CFR § 200.303, these controls are embedded throughout each phase to promote consistency and mitigate risk. This proactive



approach helps address issues early and supports smoother project execution.

Each part of the framework includes objectives and monitoring activities tailored to its stage in the grant lifecycle (see Figure 1). Risk-based tools and rubrics support institutional discussions about oversight needs and help inform the appropriate level of support. By promoting consistency and shared responsibility, the framework helps strengthen institutional stewardship and contribute to positive student outcomes.

Figure 1 Grant Lifecycle Monitoring Objects by Stage

## Grant Lifecycle Monitoring: Part 1 – Pre-Award

**Objective: Support proposal development that aligns with institutional priorities and complies with both funder and institutional requirements**

During the Pre-Award IRP&G works closely with faculty and administrators to identify funding opportunities that align with the College’s mission and current strategic initiatives (e.g., Vision Plan 2035, Student Equity Plan), as outlined in BP 3280. To initiate institutional review of a proposed application, faculty and staff must complete the Intent to Apply form

(available on the IRP&G website). This form functions as both an internal control and a preliminary assessment tool, evaluating factors such as project alignment, development timeline, and any match or cost share requirements. This process helps ensure that proposals are thoughtfully developed and positioned to meet both institutional and funder expectations.

Once complete, the Intent to Apply form is reviewed and signed by the appropriate Vice President, in accordance with Administrative Procedure 3280 Grants (AP 3280). This step confirms that all new, continuing, or renewing grant proposals are aligned with institutional goals prior to development and submission.

Before the final proposal is submitted to the funder, it is reviewed by the appropriate Vice President to ensure alignment with institutional priorities and readiness. As required by AP 3280, formal permission to submit the proposal is granted by our Superintendent/President. This two-step review process serves as a final internal control to confirm that the College is prepared to carry out the proposed project and meet its associated commitments.

For more information on how Pre-Award risk is evaluated, see Appendix A – Monitoring Rubrics by Lifecycle Stage, which outlines specific criteria used to assess alignment, capacity, and feasibility during the proposal development process.

## Grant Lifecycle Monitoring: Part 2 – Award

### **Objective Support the establishment of a strong and compliant operational foundation to guide grant implementation and project set up**

Once an award is formally accepted by the Governing Board, a Grant Launch Meeting is scheduled with the Supervising Administrator, Project Lead, IRP&G, and Fiscal Services. This meeting helps confirm compliance expectations, establish a shared understanding of grant management processes, and review key operational steps for implementation. To support this process, the College uses the Grant Launch Checklist: Setting Up for Success (available on the IRP&G website), which provides a guide to establishing the operational, fiscal, and compliance infrastructure needed for successful implementation. This includes reviewing the terms and conditions of the award agreement, confirming the approved budget, verifying internal controls, checking reporting timelines, and finalizing any required agreements or startup actions.

As part of the Grant Launch Meeting, a tailored monitoring plan is also developed to lay out expectations for internal compliance reviews and to establish their frequency (e.g., monthly or quarterly check-ins). This early planning helps set the project on a strong

foundation and supports regulatory compliance, timely reporting, and the overall success of the grant-funded work.

Grant Lifecycle Monitoring: Part 2 – Award, as outlined in Appendix A, is used during this stage to verify that all critical grant start-up steps are complete

### Grant Lifecycle Monitoring: Part 3 – Implementation Stage

**Objective: Monitor and verify that grant-funded activities are being carried out in alignment with the approved scope of work, budget, and applicable regulations**

During the Implementation stage, regular monitoring helps ensure that project teams remain focused on the approved scope, timeline, and budget while maintaining compliance with applicable federal, state, and institutional requirements. This stage is essential for maintaining momentum and addressing issues early.

Monitoring efforts focus on key compliance and performance areas where challenges commonly arise. These include time and effort certification, allowable cost expenditures, audit or monitoring findings, timely submission of agency reports, staffing levels, progress toward performance milestones, and the rate of fund utilization. By assessing these factors, the College helps safeguard project outcomes, uphold fiscal integrity, and protect future funding eligibility.

Monitoring frequency is informed by a tiered risk-based system and applied in coordination with Fiscal Services and supervising administrators. Low-risk projects typically undergo periodic check-ins and standard reporting, while moderate- and high-risk projects may require more frequent reviews, targeted technical assistance, and closer collaboration with IRP&G and Fiscal Services. This allows oversight to be scaled appropriately based on project complexity and compliance needs.

When compliance concerns arise, IRP&G works with the Project Lead and Supervising Administrator to identify, document, and escalate compliance concerns for resolution. If issues remain unresolved or pose significant risk - such as potential disallowed costs, repeated reporting delays, or failure to meet key milestones - they are escalated to senior leadership for institutional review and response. This process helps ensure transparency and supports the College's ongoing compliance obligations.

To promote consistent and objective oversight, the College uses a standardized monitoring rubric to assess risk indicators and determine the appropriate level of support. See Appendix A – Monitoring Rubrics by Lifecycle Stage for specific criteria used during this phase.

## Grant Lifecycle Monitoring: Part 4 – Closeout Stage

**Objective: Support the timely completion of programmatic and financial obligations, secure grant records, and document outcomes to inform future grant efforts**

The Closeout stage finalizes all programmatic and financial activities to confirm that grant obligations have been met in accordance with funder and institutional requirements. This includes reviewing final deliverables, reconciling expenditures, and archiving documentation to support audit readiness and future reference. A thorough closeout process helps maintain compliance, protects eligibility for future funding, and supports continuous improvement in grant management.

To support this process, the College uses a Grant Award Close-Out Checklist (available on the IRP&G website). This internal control tool verifies that all required activities are completed either before the end of the grant’s performance period or within the 120-day closeout window outlined in 2 CFR § 200.344. This checklist is reviewed and signed by the Project Lead, Supervising Administrator, and Fiscal Services, confirming that all reporting, fiscal, and documentation standards have been met.

Monitoring during this stage focuses on confirming that deliverables have been submitted and approved, funds are reconciled, and required records are retained. To promote transparency and institutional learning, Palomar produces a public-facing Impact Report for each completed grant. This report summarizes accomplishments in key areas such as project goals, student impact, partnerships, and institutional benefits, providing a clear record of the grant’s outcomes.

To assess readiness and determine any remaining needs for follow-up, a Closeout Risk Assessment Rubric is used. This tool supports consistent documentation of compliance status and ensures institutional responsibilities are fulfilled in alignment with applicable regulations. See Appendix A – Monitoring Rubrics by Lifecycle Stage for rubric criteria used during this phase.

### Conclusion

Palomar College’s Competitive Grant Lifecycle Monitoring Framework provides a clear, structured approach for managing grant-funded work from development through closeout. By embedding internal controls, applying risk-based monitoring, and encouraging cross-departmental collaboration, the framework supports accountability, effective implementation, and long-term project success. By promoting consistent practices and

shared expectations, it helps foster a culture of integrity, continuous improvement, and student-centered impact across all grant-funded initiatives.

### Appendix A: Monitoring Rubrics by Lifecycle Stage

The monitoring rubrics are advisory tools intended to support consistent documentation and discussion of compliance risk. They do not replace operational accountability held by Fiscal Services, Project Leads, or Supervising Administrators.

#### Grant Lifecycle Monitoring: Part 1 – Pre-Award

Area	Low Risk (1)	Moderate Risk (2)	High Risk (3)
Intent to Apply Review	Intent to Apply Form is complete; preliminary proposal concept aligns with strategic goals, capacity for proposal development is feasible.	Intent to Apply Form mostly complete; minor clarifications required.	Intent to Apply Form incomplete or unclear; key elements such as alignment, feasibility, or match requirements are missing.
Staffing Plan Approval	Staffing Plan approved and aligns with College policies and available resources.	Staffing Plan approval pending; plan mostly aligns but needs clarification.	Staffing Plan not reviewed or lacks alignment with HR practices or capacity.
Budget Review and Approval	Budget approved; aligns with funder and college requirements, including match (if applicable).	Budget submitted and under review; minor adjustments may be needed.	Budget not reviewed, contains unapproved match, or includes ineligible costs.
Final Proposal Review and Approval (Vice President & Superintendent/ President)	Final proposal draft reviewed by VP; Superintendent/ President approval secured before submission.	Final proposal draft under review; approvals anticipated within timeline.	Proposal submitted without complete internal approval.

#### Grant Lifecycle Monitoring: Part 2 – Award

Area	Low Risk (1)	Moderate Risk (2)	High Risk (3)
Award Terms and Conditions and Compliance Review	Grant agreement reviewed; key compliance requirements understood and documented.	Grant agreement reviewed with minor gaps in understanding or documentation.	Grant agreement terms, conditions, or compliance obligations not reviewed; major risks unidentified.

<b>Area</b>	<b>Low Risk (1)</b>	<b>Moderate Risk (2)</b>	<b>High Risk (3)</b>
Grant Management Systems and Budget Monitoring	Financial and project tracking systems established; budget finalized and monitoring process in place.	Financial and project tracking systems partially established; budget confirmed but monitoring informal.	Financial and project tracking systems and/or budget processes not established; high risk to fiscal compliance.
Kick-Off Meeting and Startup Coordination	Kick-Off Meeting held; compliance expectations, timelines, and grant management processes clearly reviewed.	Kick-Off Meeting held but follow-up needed to clarify some compliance expectations or deadlines.	Kick-Off Meeting not held; unclear expectations for grant management or compliance activities.
Time and Effort Reporting Setup (if applicable)	Time and Effort Reporting process established and communicated (if personnel are funded).	Time and Effort Reporting process partially in place; minor gaps in staff awareness.	No Time and Effort Reporting process established for time and effort reporting; risk of non-compliance.

### Grant Lifecycle Monitoring: Part 3 – Implementation Stage

<b>Area</b>	<b>Low Risk (1)</b>	<b>Moderate Risk (2)</b>	<b>High Risk (3)</b>
Time and Effort Reporting	Time and Effort Reporting (TER) certifications are timely and accurate; process is clearly documented. Fewer than 2 TERs outstanding.	Two TERs outstanding during the review period; minor delays in documentation.	Three or more TERs outstanding; inconsistent or unclear process for tracking and certification.
Allowable Costs	Strong fiscal controls in place; no history of disallowed costs.	Internal fiscal controls generally effective; occasional fiscal control issues promptly corrected;	Internal fiscal controls are weak or inconsistently applied; recurring unallowable costs;
Audit or Monitoring Findings	No audit findings, or all findings fully resolved with documented follow-up.	Minor audit findings addressed with corrective action plan.	Significant or unresolved audit findings; repeat issues or lack of documented resolution; risk of sanctions.
Agency Reporting	All required agency reports submitted on time and complete.	Occasional late agency reports but resolved without	Frequent late or missing agency reports; jeopardizes

Area	Low Risk (1)	Moderate Risk (2)	High Risk (3)
		impact on funding or compliance.	continued funding or compliance.
Staffing Levels	Fully staffed with minimal turnover; duties clearly assigned and maintained.	Some staffing vacancies or turnover causing limited disruption; roles covered through interim support.	Persistent staffing vacancies or staffing gaps significantly affect project operations or deliverables.
Performance Milestones	All milestones achieved on time or ahead of schedule.	Minor milestone delays with documented mitigation strategies in place.	Multiple missed milestones; delays jeopardize project goals or funder expectations.
Spending Performance	Spending aligns with project goals and timeline; on track with approved budget.	Slight under- or overspending; corrective plan in place and progress being made.	Significant under - or overspending; no clear plan to meet expenditure targets or correct deviations.

**Grant Lifecycle Monitoring: Part 4 – Closeout Stage**

Area	Low Risk (1)	Moderate Risk (2)	High Risk (3)
Final Reporting Compliance	All performance and fiscal reports submitted on time and accepted by funder.	Minor delays of performance and fiscal reports or edits required; issues resolved prior to closeout.	Performance and fiscal reports submitted late or incomplete; risk of compliance findings.
Funds Reconciliation	All funds spent appropriately and reconciled; no unspent balance.	Minor adjustments of funds needed; resolved with Fiscal Services.	Significant unspent or ineligible funds; risk of repayment or audit issues.
Record Retention & Archiving	Records are complete and archived per policy.	Some minor record gaps; follow-up documentation plan in place.	Records incomplete or missing; noncompliance risk during audit or monitoring.
Closeout Checklist completion	Close-Out Checklist completed and signed by all parties.	Checklist in progress; one or more signatures pending.	Checklist not completed or missing required documentation or sign-off.

Area	Low Risk (1)	Moderate Risk (2)	High Risk (3)
Impact Reporting	Impact Report submitted and shared internally/externally.	Impact Report draft in progress; minor edits or approvals pending.	Impact Report not initiated or delayed without clear plan.