# **Title III Policies and Procedures Manual**



ALAMO COLLEGES DISTRICT St. Philip's College

**Title III Grant Management** Office



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#### FOREWORD

Within the Alamo Community College District (dba Alamo College District) Finance Department, there is an organized Office of Grants Accounting. The District Grants Accounting Office overseas the management and accounting for all grants received by St. Philip's College. A Grants Accountant is assigned to the Title III accounts.

When the Title III grant award notice is received in the Title III Grant Management Office they will be responsible for the following:

1) Developing the appropriate budget according to guidelines,

2) Preparing budgets and budget revisions for each activity-using district approved budget forms,

3) Notifying Activity Directors of any changes, and

4) Submitting a copy of the approved budget, fiscal reporting forms, and any grant terms or conditions that apply to the President and VPs.

Requests for expenditures are initiated by Activity Directors upon review and approval by the Title III Academic Program Director and then forwarded to District Finance for processing based on availability of funds and appropriateness under the grant. The Title III Grant Management Office along with District Grants Accounting Office will maintain an up-to-date line balance for Title III grant to avoid exceeding allowable costs. Monthly financial reports are prepared in this office with assistance being given to Activity Directors. The Title III Academic Program Director signs all commitment documents, making sure current fund accounts are being used for purchases. The Alamo Colleges District Finance Department follows long-established procedures for procurement, payment, and fiscal accountability. Alamo Colleges District will follow accounting system developed by the <u>National Association of College and University Business</u> <u>Officers</u> as confirmed by the audit guide for colleges and universities published by <u>American Institute of Certified Public Accountants</u>.

#### **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**

In 1898, James Steptoe Johnston, a bishop of St. Philip's Episcopal Church of the West Texas Diocese, founded St. Philip's Normal and Industrial School, a school designed to educate and train recently emancipated slaves. Opening on March 1 of that year, the school began as a weekend sewing class for six black girls, taught by Miss Alice G. Cowan, a missionary with the Episcopal Church. During this period, the institution was known as Bowden's School. Artemisia Bowden, daughter of a former slave, joined the school as administrator and teacher in 1902 and served the College for the next 52 years. She ushered the industrial school into a college that gave residents of the San Antonio Eastside opportunities to learn and grow and give back, and made the college an integral part of our community. Bowden wanted her students to serve San Antonio and be a beacon for St. Philip's College (SPC). Graduates were called, "St. Philip's Girls", and through the dedicated work of Bowden and her constituents, SPC became synonymous with quality education and service to the community. It is now one of the oldest and most diverse community colleges in the nation, and is the only college to be federally designated as both a **Historically Black College** and a **Hispanic-Serving Institution** as of 1987.

SPC is a publicly funded, two-year community college serving the needs of predominantly Black and Hispanic students, many of whom are from low income families and educationally underserved. We are one of the five Alamo Colleges District (ACD) schools located in and serving San Antonio, Texas and the surrounding area. In addition to SPC, Northeast Lakeview College, Northwest Vista College, Palo Alto College, and San Antonio College comprise the group. Each college within Alamo Community Colleges System is independently accredited. Our service area was originally San Antonio Eastside Community, but today SPC students come from all sectors of the greater San Antonio – Bexar County metropolitan area and surrounding counties (Wilson, Guadalupe, Medina, and Atascosa). Our outreach extends beyond the main campus with courses offered at a second campus and several off-campus locations. SPC is a two-year degree and certificate granting institution with more than 52 degrees and 42 certificates offered.

#### ST. PHILIP'S COLLEGE MISSION, VISION AND VALUES

#### Our Mission

St. Philip's College, founded in 1898, is a comprehensive public community college whose mission is to empower our diverse student population through educational achievement and career readiness. As a Historically Black College and Hispanic Serving Institution, St. Philip's College is a vital facet of the community, responding to the needs of a population rich in ethnic, cultural, and socio-economic diversity. St. Philip's College creates an environment fostering excellence in academic and technical achievement while expanding its commitment to opportunity and access.

The college fulfills its mission by offering:

- 1. General courses in arts and sciences leading to an associate degree.
- 2. Transfer education for students desiring to attend senior institutions.
- 3. Developmental courses that improve the basic skills of students whose academic foundations require strengthening.
- 4. Applied Science and technical programs leading to an associate degree or certificate designed to prepare students for employment and/or to update crucial skills.
- 5. Workforce and Career development training programs for business, industry and government.
- 6. Continuing education programs for occupational and educational enrichment or certification.
- 7. Counseling and guidance designed to assist students in achieving their educational and professional goals.
- 8. Educational support services including library services, tutoring, open use computer labs and writing center.
- 9. Services and appropriate accommodations for special populations, to include adult literacy and distance education.
- 10. Quality social, cultural, and intellectual enrichment experiences for the community.
- 11. Opportunities for participation in community service and economic development projects.

#### Our Vision

St. Philip's College will be the best in the nation in Student Success and Performance Excellence.

#### Our Values

St. Philip's College is committed to building individual and collective character through the following set of shared values in order to fulfill our vision and mission.

• **Students First:** Above all, act in the best interest of the students.

- **Respect for All:** We value courtesy, responsiveness, and appreciation for diversity by treating all people with dignity and kindness.
- **Community Engaged:** We actively work in partnership with our stakeholders by responding to the needs of the community.
- **Collaboration:** We work together to achieve student success.
- **Can-Do Spirit:** We inspire resilience and persistence with a willingness to go above and beyond expectations.
- **Data-Informed:** We use quantitative and qualitative data to inform decision making and achieve student success.

#### Core Competencies

- Quality Instruction for Educational Programs
- Community Engagement
- Student Engagement

#### Strategic Priorities

- SACSCOC Reaffirmation
- Ethical Decision Making
- Graduation, Persistence, and Productive Grade Rate Improvement

#### Strategic Objectives

- Student Success
  - Provides academic and student support and align labor market-based pathways to achieve student completion.
- Leadership
  - Provides opportunities for students and employees to develop as leaders.
- Performance Excellence
  - Continuously improves our employee, financial, technological, physical and other capacities to enhance efficiency and effectiveness.
- Reaffirmation
  - Successfully submit the tem-year SACSCOC Focused Report and QEP Proposal.

#### SECTION I: ORGANIZATION AND ADMINISTRATION OF THE PROGRAM

#### **Program Administration**

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

The responsibilities of the Title III Academic Program 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 Directors.
- 3. Coordination of control of budget expenditures with Activity Directors.
- 4. Serve as the liaison between the U.S. Department of Education, St. Philip's College and the district offices.
- 5. Monitor all management reports generated by Activity Directors to ensure compliance in accordance with program regulations and institutional policies.
- 6. Monitor and approve requisitions for allowed appropriations.
- 7. Facilitate 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.

Activity Directors will work alongside the Title III Academic Program Director. The Activity Directors will have the following specific duties in addition to assisting the Director with their duties.

The responsibility of the Activity Directors:

- 1. Assist the Director in ensuring that the operations of Title III programs are consistent with the goals of the overall institutional strategic plan.
- 2. Serve as liaison between activity directors and the director.
- 3. Develop, implement and operate an approved reporting system.
- 4. Coordinate activities to maximize the utilization of staff and other program resources.
- 5. 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.
- 6. Develop guidelines for the administration of the program components.
- 7. Attend meetings to assess and improve the utilization of HBCU financial resources and ensure fiscal accountability; also to ensure that St. Philip's College is operating in compliance to the rules and regulations governed by the Title III program.
- 8. Assist as needed in the evaluation and development of an effective internal and external assessment system to assess program impacts.
- 9. Assist the director in the engagement of requested consultants
- 10. Develop and maintain complete files of all Title III activities, reports, and plans.
- 11. 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.
- 12. Coordinate fiscal aspects of the program with Title III Grant Management Office.
- 13. Arrange meetings with activity staff funded under their activity.
- 14. Develop summary information for reports as needed for the Department of Education to ensure completeness and compliance with guidelines.
- 15. Maintain contact with Title III Academic Program Director to minimize problems in program operation.
- 16. Coordinate with other Activity Directors to execute internal and external evaluation activities.

### **Points of Contact:**

Activity	POC	Phone #	Email Address
I – Project Administration	Dr. Tomeka C. Wilson/Dr. Tywain Griffen	210-486-2778 210-486-2112	tcross13@alamo.edu tgriffen2@alamo.edu
II – Center of Excellence for Math	Dr. Michou (Interim)	210-486-2733	msainthubert@alamo.edu
II – Center of Excellence for Science	Dr. Jo Dee Duncan-Mosier	210-486-7121	jduncan36@alamo.edu
Activity III – Campus Renovation	George H. Johnson III (Interim)	210-486-2178	gjohnson@alamo.edu
Activity IV – Information and Communication Technology	John Orona	210-486-2792	jorona3@alamo.edu
Activity V – Teaching with Technology	Dr. Rebecca Perez	210-486-2355	rperez129@alamo.edu
Activity VI – Student Services	Gilbert Palomo (Interim)	210-486-2157	gpalomo1@alamo.edu
Activity VII – Good Samaritans Outreach and Transition Center	William (Bill) Moseley	210-486-2506	wmoseley1@alamo.edu

#### **Policies and Procedures**

St. Philip's College'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. <u>The St. Philip's College Policies and Procedures Manual</u>, 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 St. Philip's College, regarding Title III programs.

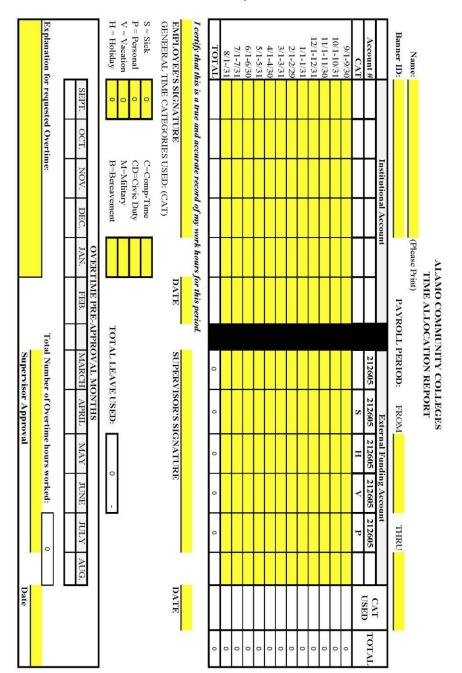
Regulations regarding fiscal control, purchasing, travel, code of conduct, procedural requirements, and additional general information are included for the optimum knowledge of project staff. Periodically, the manual will be updated to include new rules and regulations and/or changes that occur within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

- 2. A job description for each staff member will be required.
- 3. Monthly meetings with Activity Directors will be held to plan and discuss common concerns, professional conferences, and plan evaluations (internal and external).
- 4. Activity Directors 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 Presidents, and the Title III Academic Program 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. St. Philip's College uses Federal funds only to carry out projects for which funds are awarded. The Title III Academic Program Director along with District Grants Accounting Office 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 Academic Program Director will continue the practice of approving all expenditures of grant to ensure that all expenditures are valid by audit verification. *Appendix A* Time and Effort Report – Title III Report

The Title III Time and Effort Report are to certify hours worked by each employee under the grant. Official copies are signed by the supervisor and delivered to the Title III Office be submitted no later than the  $5^{\text{th}}$  of every month.



#### **Fiscal Control and Accounting Procedures**

Within Alamo Colleges District Finance Department, there is an organized Office of Grants Accounting. A Grants Accountant will be assigned to the Title III accounts. This office oversees the management and accounting for all grants and contract funds awarded to St. Philip's College.

When the Title III grant award is received, staff in the Title III Grant Management Office will be responsible for the following: 1) developing the appropriate budget lines according to guidelines, 2) preparing the District Grant Approval Form and Budget Forms for appropriate signatures by Title III Academic Program Director and College President, 3) notifying Activity Directors of approved budgets, and 4) submitting a copy of the approved budget, fiscal reporting forms and any grant terms or conditions that apply, to the Title III Academic Program Director and the Office of Grants Accounting.

Requests for expenditures are initiated by Activity Directors, reviewed and approved by the Title III Academic Program Director and then screened by District Accounts Payable for availability of funds and appropriateness under the grant. The Grants Accounting Office will 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 Academic Program Director as needed. The Title III Academic Program Director signs all commitment documents, making sure the account number and proper purchasing code are shown. The District Finance Department follows long-established procedures for procurement, payment, and fiscal accountability. Alamo Community Colleges' accounting system follows the format developed by the <u>National Association of College and University Business Officers</u> as confirmed by the audit guide for college and universities published by the <u>American Institute of Certified Public Accountants</u>.

#### **Points of Contact:**

Department	POC	Phone #	Email Address
Accounts Payable	Rosa Bertran	210-485-0322	rbertran@alamo.edu
Banner Access	Jose Rodriguez	210-485-0312	jrodriguez1472@alamo.edu
Draw Down	Amy Guerra	210-485-0303	aguerra53@alamo.edu
Grants Accounting	Lorri Wells	210-485-0348	lwells16@alamo.edu
Grant Approval Forms	Amy Guerra	210-485-0303	aguerra53@alamo.edu
Human Resources	Annette Sanchez	210-485-0207	asanchez89@alamo.edu
Payroll	Marvel Bailey	210-485-0336	mbailey38@alamo.edu
Purchasing	Karen Gottfried	210-485-0122	kgottfried@alamo.edu
SPC Super User	Jorge Flores	210-486-2505	jflores375@alamo.edu

#### 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 required by the grant. Some of these reports are completed quarterly or as needed.

Each employee, whose salary is paid in whole or in part by federal funds under the Title III Program, must submit a <u>Time and Effort Report</u>. These reports should be completed and approved by the supervisor of the employee, before it is submitted to the Title III Grant Management Office.

In addition to internal reports, the Title III Committee comprised of the Title III Academic Program Director and Activity Directors 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 that quarterly or less frequently that annually. <u>Annual reports are due 90 days after the reporting period</u>. The Secretary may require annual reports before the anniversary dates of multiple year awards in lieu of these requirements. The <u>final performance reports are due 90 calendar days</u> after the expiration or termination of the award.

#### **Budget Management**

All Title III Activity Directors should keep a running tally of expenditures and the balances for all line times within their activity. This budget sheet should be used as a guide when requisitions are submitted requesting an expenditure of Title III funds. This continual accounting process will ensure that all parties are always aware of the status of the Title III expenditures.

#### **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:

#### **Federal Requirements:**

- 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.

#### **Informed Decisions:**

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. Department of Education 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. Department of Education 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 Banner standard requisition form is used to initiate expenditures from the Title III budget. 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. Prior to receiving cost analysis you should have received supervisor notification and approval.

*Title III requisitions must be sent to the Title III Grant Management Office for programmatic and financial review prior to submission to District Finance Department Accounts Payable.* If all is correct and funds are available, the requisition is approved by the Title III Academic Program Director and sent to the Finance Office for further processing in accordance with Alamo Community Colleges' 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 Alamo Community Colleges' standard personnel action form. The Title III Academic Program 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. St. Philip's College must use the equipment in the project or program for which it 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, St. Philip's College may use the equipment in connection with other federally-sponsored activities.

St. Philip's College'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 College or the Federal Government.
- 5) Acquisition date (or date received, it 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 purchases. Refer to the <u>Alamo Community Colleges District</u> <u>Policy</u> for specific policies and guidelines.

#### CONCLUSION

The Title III Comprehensive Development Plan and the activities outlined therein are a logical extension of the goals of St. Philip's College, and in a larger sense, the mission of the institution. It will be St. Philip's College's current commitment to planning and assessment will be reflected in the administration of the Title III Programs and Services. 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 Academic Program Director. The Title III program is intended and designed to integrate into the established administrative and academic operations of the College.