

Sisseton Wahpeton College Sponsored Programs Office Policies & Procedures Manual

Updated June 2025

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This manual provides comprehensive policies and procedures for managing sponsored programs at Sisseton Wahpeton College, ensuring compliance with federal, tribal, and institutional regulations.

1. Summary of Regulatory Updates (June 2025)

This section outlines changes made to the Sisseton Wahpeton College (SWC) Sponsored Programs Policies & Procedures Manual, comparing the version approved by the Board of Trustees on September 8, 2020, with this updated version (June 2025). The updates focus on aligning with current federal, tribal, and institutional regulations, ensuring compliance and transparency for the Board of Trustees.

1.1 Indirect Cost Rate Update (2 CFR 200.414)

- 2020 Manual: Specified a federal de minimis indirect cost rate of 10%, with provisions for reduced or waived rates at the discretion of the college president.
- 2025 Manual: Updates the de minimis rate to 15% (Section 3), reflecting Office of Management and Budget (OMB) guidance (2 CFR 200.414, amended October 2024). The Vice President of Administrative Services reviews and negotiates the rate annually.
- Impact: Aligns with OMB's 2024 adjustment for tribal colleges, maximizing allowable indirect cost recovery.

1.2 Simplified Acquisition Threshold (2 CFR 200.320)

- 2020 Manual: Set the Simplified Acquisition Threshold (SAT) at \$250,000, with a micro-purchase threshold of \$10,000.
- 2025 Manual: Updates the SAT to \$350,000 (Section 1.1), per OMB's 2024 adjustment (2 CFR 200.320). Clarifies quote requirements for purchases between \$10,000 and \$350,000.
- Impact: Reduces administrative burden for purchases below \$350,000 while maintaining competitive standards.

1.3 Vendor Vetting and SAM.gov Verification (2 CFR 200.213, 200.318)

- 2020 Manual: Required debarment checks via the Excluded Parties List System (EPLS). Consultant selection involved ad hoc committee reviews for contracts over three days.
- 2025 Manual: Replaces EPLS with SAM.gov (Section 4, Appendices A & B). Introduces a Vendor Vetting Policy and standardized Vendor Disclosure and Certification Form, overseen by the Vice President of Administrative Services.
- Impact: Modernizes debarment verification, strengthening compliance with federal procurement and tribal ethical standards.

1.4 Conflict of Interest (2 CFR 200.112)

- 2020 Manual: Required conflict disclosures via a Procurement Conflict of Interest Disclosure Form, without resolution procedures.
- 2025 Manual: Adds detailed resolution procedures (e.g., recusal, mitigation plans) overseen by the Vice President of Administrative Services (Sections 1.1, 4.2). Incorporates tribal confidentiality requirements.
- Impact: Enhances transparency and compliance with federal and tribal ethical standards.

1.5 eCivis Grant Management Platform (2 CFR 200.302)

- 2020 Manual: No mention of a grant management platform; relied on manual record-keeping.
- 2025 Manual: Introduces eCivis as the centralized platform for grant lifecycle management (Section 4), with role-based access and oversight by the Vice President of Administrative Services.
- Impact: Improves transparency and compliance with federal financial management requirements.

1.6 Subrecipient Monitoring (2 CFR 200.331)

- 2020 Manual: Briefly mentioned sub-award responsibilities without detailed monitoring procedures.
- 2025 Manual: Adds specific subrecipient monitoring requirements, including compliance reviews and documentation in eCivis (Section 1.1).
- Impact: Strengthens accountability for federal funds allocated to subrecipients.

1.7 Audit Requirements (2 CFR 200.501)

- 2020 Manual: Did not explicitly address single audit requirements.
- 2025 Manual: States that expenditures of \$750,000 or more in federal funds require a single audit (Section 1.1), coordinated by the Vice President of Administrative Services.
- Impact: Clarifies compliance with OMB's single audit threshold.

1.8 Tribal Regulations (Sisseton Wahpeton Oyate Policies)

- 2020 Manual: Acknowledged tribal sovereign immunity but lacked specific tribal regulation details.
- 2025 Manual: Adds requirements for alignment with Sisseton Wahpeton Oyate policies, including confidentiality and tribal procurement preferences (Section 1.2).

- Impact: Ensures respect for tribal sovereignty and compliance with laws like TERO and PL93-638.

1.9 Bonding Requirements (2 CFR 200.304)

- 2020 Manual: No mention of bonding requirements.
- 2025 Manual: References bonding as an optional internal control measure for personnel managing grant funds (Section 1.1).
- Impact: Enhances financial security per federal and tribal policies.

1.10 Reporting and Record-Keeping (2 CFR 200.333–337)

- 2020 Manual: Required three-year record retention without centralized systems.
- 2025 Manual: Mandates secure storage in eCivis with FERPA and tribal data confidentiality (Section 8).
- Impact: Strengthens compliance with federal and tribal data protection requirements.

1.11 Summary

These updates align the manual with 2 CFR Part 200 (amended October 2024), OMB guidance, and Sisseton Wahpeton Oyate policies, ensuring SWC's sponsored programs remain compliant while supporting institutional and tribal priorities.

2. Summary of Compliance Regulations

This section provides an overview of key federal and tribal regulations governing sponsored programs at Sisseton Wahpeton College (SWC). Compliance with these regulations is critical to maintaining eligibility for funding, ensuring fiscal accountability, and upholding the College's mission and values. The Sponsored Programs Office (SPO), under the oversight of the Vice President of Administrative Services, ensures adherence to these requirements through rigorous monitoring, documentation, and reporting processes.

2.1 Federal Regulations

- 2 CFR 200 (Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards): This regulation, issued by the Office of Management and Budget (OMB), establishes standards for the administration of federal awards. Key provisions include:
 - Cost Principles (2 CFR 200.403–405): Costs must be allowable, allocable, reasonable, and consistently treated. The Vice President of Administrative Services ensures that all grant expenditures meet these criteria.

- Procurement Standards (2 CFR 200.317–326): Procurement processes, including vendor vetting, must be competitive, transparent, and compliant with federal requirements. The SPO verifies vendors through SAM.gov to ensure eligibility.
 - Subrecipient Monitoring (2 CFR 200.331): If SWC subawards funds to other entities, the SPO monitors subrecipient compliance with grant terms.
 - Audit Requirements (2 CFR 200.500–520): Organizations expending \$750,000 or more in federal funds annually must undergo a single audit. The Vice President of Administrative Services coordinates these audits and implements corrective actions for any findings.
- Family Educational Rights and Privacy Act (FERPA): Ensures confidentiality of student records in grant-funded programs. The SPO secures sensitive data in eCivis to comply with FERPA.
 - Conflict of Interest (2 CFR 200.112): Requires disclosure and management of conflicts of interest in vendor selection and grant administration. The Vice President of Administrative Services oversees conflict resolution.

2.2 Tribal Regulations

- Sisseton Wahpeton Oyate Tribal Policies: Grant-funded activities must align with tribal laws and values, including respect for Dakota culture and community priorities. The SPO consults with tribal leadership to ensure compliance.
- Tribal Confidentiality Requirements: Sensitive tribal data, such as cultural or proprietary information, must be protected. The SPO ensures secure storage in eCivis and restricts access to authorized personnel.
- Tribal Employment and Procurement Policies: Preference may be given to tribal members or businesses, where allowable under federal regulations (e.g., TERO Law). The Vice President of Administrative Services ensures alignment with these policies during vendor selection.

2.3 Institutional Requirements

- Fiscal Accountability: All grant funds must be tracked in eCivis and align with the College’s financial planning, as overseen by the Vice President of Administrative Services.
- Documentation and Record-Keeping: Budget records of all grants-related activities must be maintained in eCivis for at least three years or as required by the funding agency.
- Approval Processes: The Vice President of Administrative Services approves all grant budgets and vendor contracts to ensure compliance and alignment with institutional goals.

This summary serves as a reference for key compliance requirements. Detailed procedures are provided in the following sections. For additional guidance, contact the Sponsored Programs Office at ltallbear@swcollege.edu or (605) 698-3966.

3. Introduction

The Sponsored Programs Office (SPO) at Sisseton Wahpeton College (SWC) serves as the central hub for the development, submission, and management of all externally funded grants and contracts. The SPO ensures that all sponsored programs align with the College's mission to advance educational excellence, promote Dakota values, and support community development through initiatives that foster student success and institutional growth. This manual provides comprehensive policies and procedures to guide faculty, staff, administrators, and other stakeholders in managing sponsored programs while ensuring compliance with federal, tribal, and institutional regulations. The Vice President of the Administrative Services, as the Chief Business Officer, plays a pivotal role in overseeing the fiscal management, budgetary compliance, and strategic alignment of sponsored programs with the College's financial and operational goals. The College utilizes the eCivis platform to manage the entire grant lifecycle, from proposal development through post-award reporting and compliance monitoring.

The SPO collaborates closely with the Vice President of Administrative Services to ensure that all financial aspects of grants, including budgeting, expenditure tracking, and audit preparation, are handled with transparency and accountability. This partnership supports the College's commitment to student success, operational efficiency, and fiscal responsibility. The manual is a living document, updated annually or as needed to reflect changes in federal, tribal, or institutional policies, and serves as a comprehensive resource for all grant-related activities.

3.1 Roles and Responsibilities

- Sponsored Programs Office (SPO): Coordinates all aspects of grant development, submission, and post-award administration. This includes drafting proposals, preparing budgets, submitting applications to funding agencies, monitoring compliance with grant terms, and submitting progress and financial reports. The SPO serves as the primary point of contact for Principal Investigators (PIs) and external funders, ensuring seamless communication and compliance.
- Vice President of Administrative Services: Provides strategic oversight of all financial and administrative aspects of sponsored programs. Responsibilities include approving grant budgets, ensuring compliance with federal and tribal financial regulations, coordinating annual audits, negotiating indirect cost rates, and integrating grant funding into the College's broader financial planning processes. The VP collaborates with the SPO to review financial reports and ensure fiscal accountability.
- Principal Investigators (PIs): Responsible for the programmatic implementation of funded projects, ensuring that activities align with grant objectives and deliverables.

PIs work with the SPO to develop proposals, manage project timelines, and submit progress reports through eCivis. They also collaborate with the Vice President of Administrative Services to ensure proper expenditure of grant funds and adherence to budgetary guidelines.

- Finance and Administrative Staff: Support grant-related activities under the direction of the Vice President of Administrative Services, including budget tracking, expenditure monitoring, vendor vetting, and preparation of financial reports. They ensure that all financial transactions are recorded accurately in eCivis and comply with institutional and federal guidelines.
- Information Technology Services Department: Supports the technical infrastructure for eCivis, including user access, data security, and system maintenance, ensuring that the platform operates effectively for grant management.

This delineation of roles ensures that all aspects of sponsored programs are managed efficiently, transparently, and in compliance with applicable regulations.

4. Indirect Costs and De Minimis Rate

Sisseton Wahpeton College applies a federally authorized de minimis rate of 15% for indirect costs on modified total direct costs (MTDC) unless a federally negotiated rate is in place. This rate, updated from the previous 10% rate, reflects current federal policy as outlined in 2 CFR 200.414 (amended October 2024) and is applied consistently across all sponsored programs to cover administrative and operational expenses not directly attributable to specific grant activities. The Vice President of Administrative Services is responsible for reviewing and negotiating the indirect cost rate annually with federal agencies to ensure compliance with federal guidelines and alignment with the College's strategic financial planning. This process involves analyzing the College's operational costs, consulting with federal program officers, and documenting the rationale for the applied rate to maintain transparency and accountability.

4.1 Application of Indirect Costs

Modified Total Direct Costs (MTDC) include all direct costs associated with a grant, such as salaries, wages, fringe benefits, supplies, travel, and other allowable expenses, but exclude capital expenditures, equipment purchases exceeding \$5,000, participant support costs, and other items specified in federal regulations (e.g., 2 CFR 200.68). The 15% de minimis rate (or a negotiated rate, if applicable) is applied to the MTDC to calculate indirect costs, which are then included in grant budgets to support institutional overhead, such as facilities maintenance, administrative support, and utilities.

For example, if a grant has \$100,000 in MTDC (e.g., \$60,000 for salaries, \$20,000 for supplies, and \$20,000 for travel), the indirect cost at the 15% de minimis rate would be \$15,000, bringing the total budget to \$115,000. The Vice President of Administrative Services ensures that the application of indirect costs is consistent, transparent, and compliant with federal and tribal regulations. The SPO provides guidance to PIs on incorporating indirect

costs into budgets and ensures that all calculations are documented in eCivis. A reference guide on indirect costs, including a list of allowable and unallowable costs, is available from the SPO upon request. Questions about indirect cost calculations or exceptions should be directed to the Sponsored Programs Officer at ltallbear@swcollege.edu or (605) 698-3966.

5. eCivis Grant Management Platform

Sisseton Wahpeton College uses the eCivis platform as its primary tool for managing the full lifecycle of sponsored programs, encompassing pre-award activities (e.g., proposal development, budget preparation, and submission) and post-award activities (e.g., budget tracking, expenditure reporting, compliance monitoring, and audit preparation). All grant-related documents, including proposals, budgets, progress reports, financial reports, vendor vetting records, and compliance documentation, must be uploaded and tracked through eCivis to ensure a centralized, secure, and auditable record. The platform enhances transparency, streamlines workflows, and facilitates collaboration among the SPO, PIs, finance staff, and the Vice President of Administrative Services.

The Vice President of Administrative Services collaborates with the SPO to review financial data entered into eCivis, ensuring accuracy, compliance with federal and tribal regulations, and alignment with the College's budgetary and reporting requirements. The platform's reporting tools are used to generate detailed financial summaries, compliance reports, and audit documentation, which are critical for institutional accountability and maintaining eligibility for federal and tribal funding.

5.1 eCivis Training and Access

To ensure effective use of the eCivis platform, the Sponsored Programs Office coordinates comprehensive training sessions for faculty, staff, and administrators involved in grant management. Training is offered annually in both in-person and virtual formats to accommodate diverse schedules and needs. Topics covered include:

- Navigating the eCivis interface and user dashboard.
- Uploading and managing grant-related documents (e.g., proposals, budgets, reports).
- Generating financial and compliance reports.
- Ensuring data accuracy and adherence to federal and tribal regulations.
- Troubleshooting common issues and accessing technical support.

Additional training sessions are available upon request for new staff, PIs, or those needing a refresher. To schedule training, contact the Sponsored Programs Officer at ltallbear@swcollege.edu or (605) 698-3966. The SPO maintains a detailed eCivis user guide, available on the College's intranet, which includes step-by-step instructions for common tasks, FAQs, and best practices for data entry.

Access to eCivis is managed by the Information Technology Services Department, which assigns role-based permissions to ensure data security and restrict access to authorized users

only. For example, PIs may have access to project-specific data and reporting tools, while the Vice President of Administrative Services has access to financial and compliance reports across all grants. New users must complete a mandatory training session before receiving login credentials. The Vice President of Administrative Services reviews all financial data entered into eCivis to ensure accuracy, compliance, and alignment with the College's financial strategies. Any discrepancies identified during this review are addressed promptly with the SPO and relevant PIs to maintain fiscal integrity.

6. Vendor Vetting and Certification

All vendors engaged under grant-funded contracts must undergo a rigorous vetting and certification process to ensure compliance with federal regulations (e.g., 2 CFR 200.318), tribal policies, and institutional standards. Vendors are required to submit a completed Vendor Disclosure and Certification Form (see Appendix B), which collects critical information on their business status, potential conflicts of interest, and compliance with federal requirements. SPO staff verify each vendor's status through SAM.gov to ensure they are not debarred, suspended, or otherwise ineligible to receive federal funds. Additionally, conflict-of-interest disclosures are assessed to prevent any ethical or legal issues that could jeopardize the College's reputation or funding eligibility.

The Vice President of Administrative Services oversees the vendor vetting process, ensuring that all steps are completed accurately and that the process aligns with federal regulations and institutional policies. The VP's oversight ensures that vendor selection supports the College's commitment to transparency, accountability, and fiscal responsibility.

6.1 Vendor Vetting Process

The following detailed steps must be followed for all grant-funded vendors to ensure compliance, transparency, and accountability:

1. **Vendor Submission:** Vendors must submit a completed Vendor Disclosure and Certification Form (Appendix B) to the Sponsored Programs Office. The form includes details such as the vendor's legal name, tax identification number, business structure (e.g., sole proprietorship, corporation), contact information, and any relationships with College employees, board members, or other stakeholders that could pose a conflict of interest.
2. **SAM.gov Verification:** SPO staff access SAM.gov to verify the vendor's registration status and confirm that they are not listed on the Excluded Parties List System (EPLS). This step ensures compliance with federal regulations prohibiting contracts with debarred or suspended entities. A screenshot of the SAM.gov verification result is retained for documentation.
3. **Conflict-of-Interest Review:** The SPO reviews the vendor's disclosure form for potential conflicts of interest, such as financial or personal ties to College employees, board

members, or other stakeholders. Any identified conflicts are documented in a conflict-of-interest report and escalated to the Vice President of Administrative Services for further review.

4. **Approval by Vice President of Administrative Services:** The VP reviews the vendor's documentation, SAM.gov verification results, and conflict-of-interest assessment to ensure compliance with federal and tribal regulations. The VP may request additional information, such as references or financial statements, before granting approval. Approved vendors are notified by the SPO, and a record of the approval is entered into eCivis.
5. **Documentation in eCivis:** All vetting documentation, including the Vendor Disclosure and Certification Form, SAM.gov verification results, conflict-of-interest reports, and approval records, is uploaded to eCivis for record-keeping and audit purposes. This ensures a centralized and auditable record of the vetting process.

6.2 Conflict-of-Interest Resolution

If a potential conflict of interest is identified during the vendor vetting process, the Sponsored Programs Office documents the issue in detail, including the nature of the conflict (e.g., financial interest, familial relationship) and the parties involved. The issue is then escalated to the Vice President of Administrative Services, who determines the appropriate course of action. Options may include:

- **Recusal:** Requiring individuals with a conflict (e.g., a College employee or board member) to recuse themselves from decision-making related to the vendor selection or contract management.
- **Alternative Vendor Selection:** Selecting a different vendor to avoid the conflict, ensuring that the alternative vendor meets all eligibility criteria.
- **Mitigation Plan:** Developing a plan to manage the conflict, such as implementing additional oversight or monitoring procedures, subject to approval by the VP and, if necessary, the College's legal counsel.

The Vice President of Administrative Services may convene a review panel, including representatives from the SPO, Human Resources, and/or legal counsel, to evaluate complex conflicts. All conflict-of-interest resolutions are documented in eCivis, including the rationale for the decision and any actions taken. Significant conflicts (e.g., those involving substantial financial implications or high-level stakeholders) are reported to the College President for additional oversight. This process ensures transparency, compliance with federal regulations (e.g., 2 CFR 200.112), and adherence to tribal policies governing ethical conduct.

7. Financial Reporting and Audits

The Vice President of Administrative Services is responsible for scheduling and overseeing the College's annual financial audits, which include a comprehensive review of all sponsored

programs. The VP collaborates with external auditors to provide necessary financial documentation, explain the College's accounting system, and address any questions related to grant expenditures, indirect cost allocations, and compliance with federal and tribal regulations. The Sponsored Programs Office supports this process by ensuring that all grant-related financial data is accurately recorded in eCivis, including budgets, expenditure reports, vendor contracts, and compliance documentation.

Regular financial reports are prepared for the College President, Board of Directors, and other stakeholders as directed by the Vice President of Administrative Services. These reports include:

- **Grant Expenditure Summaries:** Detailed breakdowns of how grant funds are spent, categorized by direct costs (e.g., salaries, supplies, travel) and indirect costs (e.g., overhead). These summaries are cross-referenced with eCivis data to ensure accuracy.
- **Compliance Status Reports:** Updates on adherence to federal (e.g., 2 CFR 200), tribal, and institutional regulations, including any corrective actions taken to address non-compliance issues.
- **Fiscal Projections:** Forecasts of future grant funding, expenditures, and cash flow to support strategic planning and budgeting. These projections are used to set enrollment targets, plan capital projects, and align grant activities with institutional priorities.

The VP ensures that these reports are accurate, timely, and aligned with the College's financial goals. The SPO assists by compiling data from eCivis, coordinating with PIs to verify programmatic and financial information, and ensuring that all reports meet funder requirements. In the event of audit findings, the Vice President of Administrative Services develops and implements corrective action plans in collaboration with the SPO to address any identified issues promptly. These plans are documented in eCivis and monitored to ensure resolution, maintaining the College's eligibility for federal and tribal funding.

8. Grant Proposal Development

The Sponsored Programs Office works closely with Principal Investigators and the Vice President of Administrative Services to develop competitive grant proposals that advance the College's mission, vision, and institutional priorities. The proposal development process is collaborative and includes the following components:

- **Narrative Development:** The SPO assists PIs in drafting proposal narratives that clearly articulate project goals, objectives, activities, and alignment with funding agency priorities. Narratives are reviewed for clarity, coherence, and compliance with sponsor guidelines.
- **Budget Development:** The SPO and PIs collaborate to create detailed budgets, including direct costs (e.g., salaries, wages, fringe benefits, supplies, travel) and indirect costs (using the 15% de minimis rate or a negotiated rate). Budgets are designed to be realistic, allowable, and aligned with federal cost principles (e.g., 2 CFR 200.403–405). The Vice President of Administrative Services reviews and approves all budgets

to ensure alignment with institutional financial priorities and compliance with federal and tribal regulations.

- **Supporting Materials:** The SPO coordinates the collection of supporting materials, such as letters of support, institutional data (e.g., enrollment statistics, program outcomes), and compliance certifications (e.g., Institutional Review Board approvals). These materials are reviewed to ensure they meet funder requirements and enhance the proposal's competitiveness.
- **Submission through eCivis:** All proposal materials, including narratives, budgets, and supporting documents, are uploaded to eCivis for internal review and approval by the SPO and the Vice President of Administrative Services before submission to the funding agency. The eCivis platform tracks the submission process and maintains a record of all correspondence with funders.

The Vice President of Administrative Services ensures that proposed budgets are realistic, compliant, and aligned with the College's long-term financial planning. The SPO edits proposal narratives and budgetary justifications to ensure clarity, coherence, and adherence to sponsor guidelines. This collaborative process maximizes the likelihood of funding success and ensures fiscal accountability throughout the grant lifecycle.

9. Compliance with Federal and Tribal Regulations

The Sponsored Programs Office, under the oversight of the Vice President of Administrative Services, is responsible for ensuring compliance with all applicable federal regulations (e.g., 2 CFR 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards) and tribal policies governing the Sisseton Wahpeton Oyate. Key compliance activities include:

- **Timely Reporting:** Submitting progress reports, financial reports, and other required documentation to funding agencies on time, as tracked through eCivis. The SPO coordinates with PIs to ensure that programmatic reports are accurate and align with financial data.
- **Confidentiality:** Adhering to confidentiality requirements for sensitive data, such as student information, proprietary project details, or tribal data, in accordance with federal laws (e.g., Family Educational Rights and Privacy Act) and tribal policies. The SPO ensures that all grant-related documents are stored securely in eCivis.
- **Expenditure Monitoring:** Reviewing all grant expenditures to ensure they are allowable, allocable, and reasonable under federal cost principles (e.g., 2 CFR 200.403–405). The Vice President of Administrative Services conducts regular reviews of financial transactions to identify and address any discrepancies, such as unallowable costs or overspending.
- **Record-Keeping:** Maintaining comprehensive records of all grant-related activities in eCivis, including budgets, expenditures, reports, vendor contracts, and compliance

documentation. These records are organized to facilitate audits and ensure transparency.

The Vice President of Administrative Services works with the SPO to monitor compliance, address any issues promptly, and ensure that all required federal and tribal reports are completed accurately and submitted on time. Any non-compliance issues, such as late reports or unallowable expenditures, are escalated to the College President for resolution.

10. Appendices

10.1 Appendix A: Vendor Vetting Policy

The Vendor Vetting Policy ensures that all vendors engaged under grant-funded contracts meet federal, tribal, and institutional standards for eligibility, transparency, and accountability. The policy aligns with 2 CFR 200.318, which requires competitive and transparent procurement processes, and incorporates Sisseton Wahpeton Oyate tribal policies to prioritize ethical conduct and tribal preferences where allowable.

Policy Objectives:

- Ensure vendors are eligible to receive federal funds by verifying their status through SAM.gov.
- Identify and resolve potential conflicts of interest to maintain transparency and ethical standards.
- Document all vetting activities in eCivis to facilitate audits and compliance reviews.
- Align vendor selection with tribal policies, such as TERO Law, where applicable.

Vetting Procedures:

1. Vendors submit a Vendor Disclosure and Certification Form (Appendix B) to the SPO.
2. SPO staff verify the vendor's SAM.gov status, retaining documentation of the results.
3. The SPO reviews disclosures for conflicts of interest, escalating any issues to the Vice President of Administrative Services.
4. The VP approves or denies the vendor based on compliance with federal and tribal regulations.
5. All documentation is uploaded to eCivis for record-keeping.

Conflict-of-Interest Management:

- Conflicts are documented and resolved through recusal, alternative vendor selection, or a mitigation plan.
- Significant conflicts are reported to the College President for oversight.

- All resolutions are recorded in eCivis to ensure transparency.

The Vice President of Administrative Services oversees the implementation of this policy, ensuring that vendor vetting is consistent, compliant, and aligned with the College's mission and values.

10.2 Appendix B: Vendor Disclosure and Certification Form

The Vendor Disclosure and Certification Form is a mandatory requirement for all vendors seeking to engage in grant-funded contracts with Sisseton Wahpeton College. The form ensures compliance with federal regulations (e.g., 2 CFR 200.318) and tribal policies by collecting critical information on vendor eligibility, business status, and potential conflicts of interest.

Form Components:

- **Vendor Information:** Legal name, tax identification number, SAM.gov Unique Entity Identifier (UEI), business structure (e.g., sole proprietorship, corporation), and contact details.
- **Eligibility Certification:** Confirmation that the vendor is not debarred, suspended, or otherwise ineligible to receive federal funds, as verified through SAM.gov.
- **Conflict-of-Interest Disclosure:** Details of any financial or personal relationships with SWC employees, board members, or other stakeholders that could pose a conflict of interest.
- **Compliance Certification:** Acknowledgment that the vendor will comply with all federal regulations (e.g., 2 CFR 200), tribal policies, and grant terms, including reporting and record-keeping requirements.
- **Signature and Date:** The vendor's authorized representative must sign and date the form to certify the accuracy of the provided information.

Submission and Review:

- Vendors submit the completed form to the Sponsored Programs Office via email (ltallbear@swcollege.edu) or in hard copy to 12572 BIA Hwy 700, Agency Village, SD 57262.
- The SPO reviews the form for completeness and verifies the vendor's SAM.gov status.
- The Vice President of Administrative Services approves the vendor based on the review and conflict-of-interest assessment.
- All documentation is uploaded to eCivis for audit purposes.

The Vendor Disclosure and Certification Form is available from the Sponsored Programs Office upon request. For assistance with completing the form, contact the SPO at (605) 698-3966.

Vendor Disclosure and Certification Form Sisseton Wahpeton College Vendor Disclosure and Certification Form for Grant-Funded Contracts

Instructions: All vendors seeking to provide goods or services under grant-funded contracts at Sisseton Wahpeton College must complete this form. Submit the completed form to the Sponsored Programs Office at ltallbear@swcollege.edu. Incomplete or inaccurate forms may delay the vetting process. Contact the Sponsored Programs Office at (605) 698-3966 for assistance.

Part 1: Vendor Information

- Legal Business Name: _____
- Doing Business As (DBA), if applicable: _
- Tax Identification Number (TIN): _
- SAM.gov Unique Entity Identifier (UEI): _
- Business Address: _____
- Contact Person: _____
- Phone Number: _____
- Email Address: _____
- Business Structure: Sole Proprietorship Partnership Corporation LLC Other (specify): _____

Part 2: Conflict-of-Interest Disclosure

Please disclose any relationships that may pose a conflict of interest with Sisseton Wahpeton College, its employees, board members, or other stakeholders. A conflict of interest may include financial interests, familial relationships, or other affiliations that could influence decision-making.

- Do you, your employees, or your immediate family members have any financial or personal relationships with SWC employees, board members, or other stakeholders? No Yes (If yes, provide details below):

- Have you or your business been involved in any legal or ethical issues that could affect your eligibility to contract with SWC?

No Yes (If yes, provide details below):

Part 3: Certifications

By signing below, the vendor certifies that:

- The information provided in this form is accurate and complete to the best of their knowledge.
- The vendor is registered in SAM.gov and is not debarred, suspended, or otherwise ineligible to receive federal funds.
- The vendor complies with all applicable federal regulations (e.g., 2 CFR 200) and tribal

policies governing the Sisseton Wahpeton Oyate.

- The vendor will promptly notify the Sponsored Programs Office of any changes to the

information provided or any issues that may affect their eligibility.

Vendor Signature: _____ Printed Name and Title: __ Date: _

Part 4: For SWC Use Only

- SAM.gov Verification Completed: Yes No

Date: ____ Verified by: _

- Conflict-of-Interest Review Completed: No Conflicts Identified Conflicts Identified (Escalated to VP)

Date: ____ Reviewed by: _____

- Approval Status: Approved Denied Additional Information Required

Date: ____ Approved by (Vice President of Administrative Services): __

- eCivis Documentation: Uploaded Pending

Date: ____ Uploaded by: _____

Note: This form must be submitted to the Sponsored Programs Office for review. Approved vendors will be notified within 10 business days. Contact Sponsored Programs Office at (605) 698-3966 with questions.

Note

This manual provides a comprehensive guide to managing sponsored programs at Sisseton Wahpeton College, with a focus on transparency, compliance, and fiscal accountability. The Vice President of Administrative Services plays a critical role in ensuring that all financial and administrative aspects of sponsored programs align with the College's mission and strategic priorities.

The addition of the Vendor Vetting Policy and Vendor Disclosure and Certification Form strengthens the College's ability to maintain compliance and ethical standards in vendor selection. For further clarification, training, or assistance with any aspect of sponsored programs, contact the Sponsored Programs Officer at (605) 698-3966.