



ADN-to-BSN Completion Grant: Program Compliance Guide for Community College Grantees

June 2024

Overview

This ADN-to-BSN Completion Grant program aims to respond to the public health and negative economic impacts of the pandemic by increasing the number of nurses with bachelor’s degrees by creating access to BSN programs on community college campuses through collaborative partnerships. The State of Michigan is awarding a minimum of \$2 million to each eligible community college that chooses to participate to support the creation and execution of a program that allows individuals who completed an ADN to complete a BSN. To participate, colleges had to design an eligible program and submit a letter of intent to participate by September 30, 2023. Upon the approval of the LOI, colleges and the State of Michigan execute a grant agreement. This guidance document provides important information for implementation.

[Sec. 216b of PA 144 of 2022](#) appropriated \$56 million of federal State and Local Fiscal Recovery Fund (SLFRF) funding to provide grants to eligible community colleges to support a program that would help students who have completed an Associate Degree in Nursing (ADN) to earn a Bachelor of Science in Nursing (BSN).

An executed grant agreement reflects that the college has provided to the State:

1. A letter of intent to participate and budget that describe the program that has been designed,
2. A signed agreement with a BSN-granting institution that meets basic program requirements,
3. Information about the strategic input and engagement from local health care employers and the local workforce development agency.

This guidance is meant to help institutions implementing the program ensure compliance with all program requirements. It contains:

- **Program Details:** Information regarding program administration and requirements.
- **Expense Reimbursements/Invoicing:** Instructions on how to submit invoices, which must be done at least quarterly.
- **Quarterly Report:** Information about the mandatory quarterly reporting template and deadlines.
- **Summary of Monitoring Activities:** An overview to prepared by Guidehouse, which has been retained by the State of Michigan to conduct compliance monitoring. This is provided to create transparency about what attributes program monitors will be investigating during monitoring.
- **The text of Sec. 216b of PA 144 of 2022** creating the ADN-to-BSN Completion Grant program, for easy reference.

Questions about any aspect of this guide or the information herein can be directed to [MiLEAP-Sixtyby30@michigan.gov](mailto:Sixtyby30@michigan.gov).

Program Details

Because each college is implementing its own design and approach to the ADN-to-BSN program, these guidelines are designed to maximize program flexibility but provide adequate information to ensure compliance. Ultimately, colleges should refer to the policy boilerplate when making any programmatic decisions to ensure they are meeting policy aims. The Office of Sixty by 30 wants to particularly note a few important details, though:

State and Local Fiscal Recovery Fund (SLFRF) Requirements

The funding being used for this project is Federal State and Local Fiscal Recovery Funds (SLFRF). Usage of these funds must comply with the federal requirements of the Federal Fiscal Relief Fund. Funds must be expended by **September 30, 2026**. There will be no extensions. SLFRF is federal funding and, as such, funds from this project cannot be used to pay expenses that will be or have been reimbursed by another federal program.

Colleges should review program requirements, including Treasury’s [SLFRF Final Rule, Final Rule Overview](#), and the [Uniform Guidance](#) along with the recipient’s Award Terms and Conditions, to determine and record eligible uses of SLFRF funds.

Additional requirements of SLFRF funding are spelled out in the program grant agreements. Colleges may want to especially note the single audit requirement, the reporting requirements, the prohibition against double-counting any expenses, and the requirements to perform subrecipient monitoring if issuing any subawards.

Budgets

The Office of Sixty by 30 needs to have an up-to-date project budget on-hand in order to process reimbursement requests/invoices. Invoices will be matched to the project budget before they are approved to ensure funds are being directed toward eligible expenses. Grant recipients can change their budget as the program evolves but should send a new budget to the Office of Sixty by 30 to keep on file. Sixty by 30 can help verify that any new expense categories are eligible. Updating the budget does not require a formal grant amendment, as the budget is not technically included in the grant agreement.

Financial Aid

If colleges are using any of their funding to provide financial aid to students, it should be used exclusively for students who have already received an ADN and are now pursuing a BSN. This is in line with the policy that states that the purpose of the funding is “to support the creation and execution of a program that allows *individuals in this state who have attained an associate degree in nursing* to complete a bachelor of science degree in nursing” (emphasis added).

Some colleges may be concerned that they will not be able to recruit a BSN cohort. In that case, a college may request permission to provide financial aid to students who are still earning their ADN but who express a commitment to enrolling afterwards (or concurrently) in a BSN program.

Eligible Expenses

The boilerplate language regarding eligible expenses is quite broad. Colleges are encouraged to ensure that expenses tie directly back to the original program intent, which is the support students who have already received an ADN in their pursuit of a BSN, which must occur at least partially on a community college campus. Grant funding may be used but is not limited to the following program expenses:

- Personnel costs associated with delivering BSN programs on community college campuses.
- Investments in community college facilities to support the delivery of BSN programming.
- Outreach and recruitment of potential students.
- Student financial aid or financial assistance to reduce the overall cost of completing a BSN program.
- Assessment of program success and the ability to recruit, retain, train, and graduate more BSN-prepared nurses in this state.

For any expense, additional students may also benefit (for instance, a resource purchased doesn't have to be restricted to the use of BSN students alone), but there must be a clear tie to the delivery of BSNs and a benefit to student pursuing a BSN. The State discourages the use of these funds to purchase equipment or other resources that will only benefit students still completing their ADN.

Prohibited Expenses

According to federal guidelines, recipients of the funding may not use SLRF funds for the following:

- A program, service, or capital expenditure that includes a term or condition that undermines efforts to stop the spread of COVID-19. A program or service that imposes conditions on participation or acceptance of the service that would undermine efforts to stop the spread of COVID-19 or discourage compliance with recommendations and guidelines in CDC guidance for stopping the spread of COVID-19 is not a permissible use of SLFRF funds.
- In violation of the conflict of interest requirements contained in the Award Terms and Conditions or the Office of Management and Budget's Uniform Guidance, including any self-dealing or violation of ethics rules. Recipients are required to establish policies and procedures to manage potential conflicts of interest.
- Recipients should also be cognizant that federal, state, and local laws and regulations, outside of SLFRF program requirements, may apply. Furthermore, recipients are also required to comply with other federal, state, and local background laws, including environmental laws and federal civil rights and nondiscrimination requirements, which include prohibitions on discrimination on the basis of race, color, national origin, sex, (including sexual orientation and gender identity), religion, disability, or age, or familial status (having children under the age of 18).

Essential Program Requirements

Rather than reiterating all requirements here, colleges should refer directly to the policy language to identify the program requirements and review the Summary of Monitoring Activities section of this document. The Office of Sixty by 30 will particularly note the following requirements because of the number of questions that have been received regarding these issues during the LOI process:

- The policy states a requirement that “BSN completion courses to be taught at least partially in person on community college campuses.” These programs must include some in-person components that take place on the community college campus.
- Agreements with four-year partners must be five years in duration, even though the funding ends on September 30, 2026.
- A co-branding arrangement with the four-year partner must be in place.
- Ongoing engagement with employer stakeholders is required.

This list is not exhaustive. Colleges are responsible for reviewing the policy language, grant agreement, and Summary of Monitoring Activities to develop a thorough understanding of program requirements.

Program Licensing

The Office of Sixty by 30 has been informed by the Nurse Education Committee of the Michigan Department of Licensing and Regulatory Affairs (LARA) that BSN completion programs are considered post licensure programs. As a result, if a BSN program participates in an affiliation agreement with a community college, it must notify the Board of Nursing via a Major Program Change if there are unlicensed students enrolled in courses specific to the nursing program (i.e.: NUR classes). The criteria for a Major Program Change can be found in [R 338.10303c\(2\)](#). Further, if a dually or concurrently enrolled student does not complete the ADN program but matriculated to the prelicensure BSN program, that student would be counted in the approved seat limits for the prelicensure BSN program.

Questions about this procedure can be answered by the Board of Nursing if they are sent to the following email address: BPL-BoardSupport@michigan.gov.

Critical Communication

Colleges should immediately alert the Office of Sixty by 30 if:

- The program or relationship with a college’s four-year partner is ending prematurely.
- The college has concerns about its ability to spend down its entire grant by September 30, 2026.
- The program described in the college’s LOI and grant agreement is undergoing significant design changes.
- The program is struggling to enroll the number of students anticipated in the LOI.

Expense Reimbursements/Invoicing

In order to receive payment for ADN-to-BSN activities, colleges must submit itemized invoices to Sixty by 30. **Following execution of a grant agreement, invoices must be submitted at least quarterly using the required invoice template.** Quarterly invoices are due by March 31, June 30, September 30, and December 31. If no previous invoice has been submitted that quarter and if no spending occurs in a given quarter, a reimbursement request for zero dollars should be submitted.

Invoices can also be sent more frequently than quarterly, up to monthly. Invoices received by the end of each month will be processed during the first week of the following month.

If you have received an advance, use the invoice template to report on expenditures made against the advance. Quarterly spending reports on the spend-down of the advance are required.

Please use the invoice template provided by Sixty by 30, which has been sent as an excel attachment. Instructions are provided throughout the template as comments (a purple marking in the spreadsheet indicates that a comment can be expanded). A brief summary is also provided below.

- Cover tab:
 - First five rows (Institution Name, Grant Number, ALN Number, FAIN Number, SIGMA Vendor Code) will not change over time and should be entered in each invoice.
 - Invoice Number and Date will auto-populate from the Billing Invoice tab and does not need to be edited.
 - Total Authorized Budget is already populated with \$2,000,000 per your grant agreement and does not need to be edited.
 - Total Amount Expended to Date and Total Amount Reimbursed to Date will need to be filled in based on previous invoice information. The Total Amount Requesting for Reimbursement will auto-populate from the Billing Invoice tab and does not need to be edited.
- Billing Invoice tab:
 - Invoice Number: enter an invoice number to distinguish this invoice from previous ones. An invoice number can take any form you choose. Additionally, please copy/paste a small image of your institution's logo directly to the left of the Sixty by 30 logo.
 - Today's Date, Expenditure Period, Payment Due By: provide applicable dates.
 - Invoice Total: this will auto-populate from data in the rest of the sheet and does not need to be edited. See below for details.
 - Name of Contact, Institution Name, Institution Address: unless there are personnel changes, these cells will be unchanged from invoice to invoice.
 - Type of Expense: provide the category that best describes the expenditure. These should match the categories listed in your grant agreement (e.g. fringes, supplies, personnel, etc.).
 - Details: provide a brief description of the expenditure.
 - Quantity, Unit Price, Line Total: provide the number and price of expenditures for each line item. In the Quantity and Unit price columns. Those data will populate the Line Total column. The sum of all of the cells in the Line Total column will populate the Invoice Total cell at the top of the page.
 - Capital Expenditure: mark whether the expenditure is a capital Expenditure. Per U.S. Department of Treasury requirements, if the expenditure is for capital improvements, you will need to provide a brief explanation why the expenditure is appropriate and necessary.

Quarterly Report

Institutions are required to report on their program quarterly, starting with the first deadline after they have an executed grant agreement. The report template is provided by Sixty by 30 as separate excel attachment and must be submitted by the dates in the table below.

Reporting Period	Quarterly Due Date
October 1, 2023 – December 31, 2023	January 10, 2023
January 1, 2024 – March 31, 2024	April 10, 2024
April 1, 2024 – June 30, 2024	July 10, 2024
July 1, 2024 – September 20, 2024	October 10, 2024
October 1, 2024 – December 31, 2024	January 10, 2025
January 1, 2025 – March 31, 2025	April 10, 2025
April 1, 2025 – June 30, 2025	July 10, 2025
July 1, 2025 – September 20, 2025	October 10, 2025
October 1, 2025 – December 31, 2025	January 10, 2026
January 1, 2026 – March 31, 2026	April 10, 2026
April 1, 2026 – June 30, 2026	July 10, 2026
July 1, 2026 – September 20, 2026	October 10, 2026
October 1, 2026 – December 31, 2026	January 10, 2027

There are instructions throughout the reporting template. Please start by reviewing the overall instructions on the Instructions tab, note the multiple tabs included in the quarterly report, and note the instructions about when to complete each tab.

- **Cover sheet** – must be completed in the first submitted report and reviewed in subsequent reports. This tab will only require updating when information changes.
- **Program updates** – includes basic program design and implementation information and must be updated quarterly.
- **Subawards** – only complete if issuing subawards; if so, complete every quarter. Copy-and-paste the required columns for each subaward if issuing more than one.
- **Enrollment** – provides basic student data for the most recent completed semester. Update in January, July, and October reports. In April, let January report data remain.
- **Annual Outcomes** – only complete in October, with data from the prior academic year.

Please also follow the file naming and submission instructions in the cover sheet.

If there are remaining questions, do not hesitate to reach out to Sixty by 30 for guidance.

Summary of Monitoring Activities

The following section was prepared by the State's compliance monitoring partner for this program, Guidehouse.

Introduction

This memorandum provides guidance to FRF Program #47 (ADN to BSN) subrecipients regarding compliance monitoring activities. All colleges participating in the ADN to BSN Completion Grant Program are subject to intermittent compliance monitoring, which may include reviews of whether the program is meeting requirements, the eligibility of expenses, and eligibility of any aid being awarded to students. Funds expended under MiLEAP FRF Program 47, ADN to BSN, are subject to compliance requirements outlined in the Uniform Guidance for Federal Awards (2 CFR 200) including, but not limited to:

- Determining the allowability of costs to be charged – directly or indirectly – to a federal award
- Adherence to reporting requirements established by federal and state statute and regulation
- Establishing and maintaining a financial management system supported by robust internal controls over these funds
- Obtaining a Single Audit, if more than \$750,000 was expended in a fiscal year
- Utilizing funds in a way that prevents the duplication of benefits of federal awards

The primary purpose of this communication is to inform subrecipients (in this case, community college grantees) of what the Sixty by 30 office and/or the PMO Compliance Team may request in order to understand and confirm each Community College's processes for managing Federal funds and to confirm that expenditures incurred were for allowable uses.

Summary of Monitoring Activities

The Sixty by 30 office monitors program subrecipient performance by collecting and reviewing monthly or quarterly invoices via the PMO-approved excel invoice template. Upon review and subsequent agency approval, subrecipient invoices will be processed within SIGMA. At a minimum, subrecipient quarterly program and expenditure outcome reports include general program information, subrecipient information, subaward information, program outcome measures, and beneficiary outcome measures via the excel quarterly report template. The PMO Compliance Team supports Sixty by 30 to ensure program and funding requirements are being met.

Sampling and Testing

Sampling

- o Sampling Community Colleges as Subrecipients

In total, 28 community colleges within the State of Michigan may qualify for ADN-to-BSN funding, providing they meet program requirements outlined within Public Act 144 of 2022. The number of recipients, program risk level, and classification of the community college under the Uniform Guidance collectively inform a sample size of **at least 5% of schools that receive funding, resulting in at least 2 community colleges that will be subject to testing on each quarter. The Compliance Team may, in consultation with the program area, increase the sample to ensure adequate representation of all participating institutions.** As part of sampling, the Compliance Team will review factors such as number of students enrolled, types of expenditures incurred, and the CC's program design/complexity to ensure the sample is representative.

- o Sampling Students as Beneficiaries

Approximately 140 students will have enrolled in the ADN to BSN Program, assuming an average of 5 students across 28 Community Colleges. As mentioned, **at least 10%** of students shall be sampled, resulting in no less than 14 students being subject to quarterly testing. The Compliance Team may, in consultation with the program area, increase the sample to ensure adequate representation of all participating students and institutions. Student sampling will be performed regardless of whether the college is providing financial aid to students directly, but financial aid accuracy will be tested when being funded by the program.

Attributes to Test

On a quarterly basis, the Compliance Team will test selected Community Colleges, students, the financial management of the program (transactions other than Financial Aid), financial aid accuracy, and validation of suspension and debarment.

- o Community College Eligibility

To test the eligibility for sampled community colleges, the Compliance Team requests the following documentation:

Community College Eligibility Attribute	Supporting Documentation
Planned for the design, delivery, and maintenance of an ADN to BSN program	Signed grant agreement with the BSN-granting institution
Utilized existing ADN to BSN programs	
BSN completion courses taught (at least partially) in person on the Community College campus	
Commitment to joint faculty appointments for qualified Community College faculty	
Establishment of a co-branding model with BSN-granting institution	
Presence of comprehensive student support (e.g., financial aid, career services, academic advising)	
5-year agreement duration with BSN-granting institution	
Received strategic input/engagement from local healthcare employers/workforce development agencies	Correspondence, meeting minutes, or similar medium illustrating strategic input/engagement

- o Financial Execution of the Program

To test the financial execution of the program for sampled community colleges, the Compliance Team requests the following documentation:

Financial Execution Attribute	Supporting Documentation
Financial Management of the Program (Transactions other than Financial Aid)	Substantiating general ledger transactions against payroll registers, invoices, and similar documentation

- o Student Eligibility

To test the eligibility for sampled students, the Compliance Team requests the following documentation:

Student Eligibility Attribute	Supporting Documentation
Completed an Associate Degree in Nursing OR ADN-seeking students (with expressed intent to pursue the BSN program) deemed eligible from 60x30	Academic Records from Community Colleges
Enrollment in eligible Community College BSN program	

- o Financial Aid Accuracy

To test the accuracy of student financial aid payments issued from the community colleges, the Compliance Team requests the following documentation:

Financial Aid Accuracy Attribute	Supporting Documentation
Student Financial Aid amounts for students aligned to this program do not exceed full cost of attendance	Individual Community College Financial Aid Policies/Procedures
Accurate disbursement of funds	Individual student financial aid package from the Community College

- o Validation of Suspension and Debarment

To test that validation of suspension and debarment occurred, the Compliance Team requests the following documentation:

Validating Suspension and Debarment	Supporting Documentation
Community Colleges, their partners, and students are not suspended or debarred	Documented processes that ensure every subrecipient and contractor is not suspended or debarred

For Reference: Section 2016b of Public Act 144 of 2022

Sec. 216b. (1) The funds appropriated in section 201(11) must be used for the creation of the Michigan ADN to BSN completion grant program. The grant program, administered by the department of labor and economic opportunity, will award each eligible community college in this state a minimum of \$2,000,000.00 to support the creation and execution of a program that allows individuals in this state who have attained an associate degree in nursing to complete a bachelor of science degree in nursing in partnership with a BSN-granting Michigan public university or Michigan not-for-profit independent 4-year college or university. This grant program will directly impact the health care field, which has been adversely affected by the COVID-19 pandemic, by increasing the training and skills of health care professionals in this state.

(2) For purposes of this section, an eligible community college must have both of the following:

(a) A signed agreement with a BSN-granting Michigan public university or Michigan not-for-profit independent 4-year college or university that provides for all of the following:

(i) A plan for the BSN-granting institution to design, deliver, and maintain an ADN to BSN completion program, including admissions, curriculum design, and accreditation, with strategic input from employers and community colleges.

(ii) The utilization of existing ADN to BSN completion programs, including 3+1 agreements, the Michigan Transfer Agreement, credit for prior learning policies, and credit for community college coursework, that meets BSN program requirements at the BSN-granting institution.

(iii) BSN completion courses to be taught at least partially in person on community college campuses with course delivery methods informed by the expressed needs of the learners in that community.

(iv) To the greatest extent possible, opportunities for joint faculty appointments for qualified community college faculty to teach BSN completion courses as adjunct or part-time faculty at the BSN-granting institution.

(v) A co-branding model to promote the BSN-granting institution and community college as partners to students, employers, and communities.

(vi) Adequate student supports, including academic advising, career services, financial aid support, mental health counseling, and other student basic needs services offered by the community college or the BSN-granting institution, or both, to ensure that students are likely to complete.

(v) A minimum 5-year agreement duration, with adequate data and evidence to support discontinuing the agreement before 5 years have elapsed.

(b) Strategic input and engagement from local health care employers and the local workforce development agency.

(3) Grant funding may be used to pay program expenses, including, but not limited to, all of the following:

(a) Personnel costs associated with delivering BSN programs on community college campuses.

(b) Investments in community college facilities to support delivery of BSN programming.

(c) Outreach and recruitment of potential students.

(d) Student financial aid or financial assistance to reduce the overall cost of completing a BSN program.

(e) Assessment of program success and the ability to recruit, retain, train, and graduate more BSN-prepared nurses in this state.

(4) The Michigan ADN to BSN completion grant program must be assessed annually for improvements in accessibility, affordability, and growth of total BSN-prepared nurses in this state. The Michigan Community College Association, Michigan Association of State Universities, and Michigan Independent Colleges & Universities Association shall submit this assessment to the house and senate appropriations subcommittees on higher education and community colleges, the house and senate fiscal agencies, and the state budget director annually no

later than September 30. The assessment is to be completed with coordination among eligible community colleges and BSN-granting institutions that receive funding to support programs and the Michigan Health and Hospital Association through the Healthcare Workforce Information Collaborative.

(5) Unencumbered funds in section 201(11) appropriated for the Michigan ADN to BSN completion grant program are designated as a work project appropriation and must not lapse at the end of the fiscal year. Unencumbered and unallotted funds must be available for expenditures for grants under this section. The purpose of the work project is to increase access to BSN programs on community college campuses through collaborative partnership. The estimated completion date of this work project is September 30, 2026.