



# Federal & State Grants Process & Procedures Manual

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**2020-2021**

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APPROVED/REVIEWED:

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By the Superintendent, Dr. Carl Dethloff and the Board of Trustees on August 17, 2020

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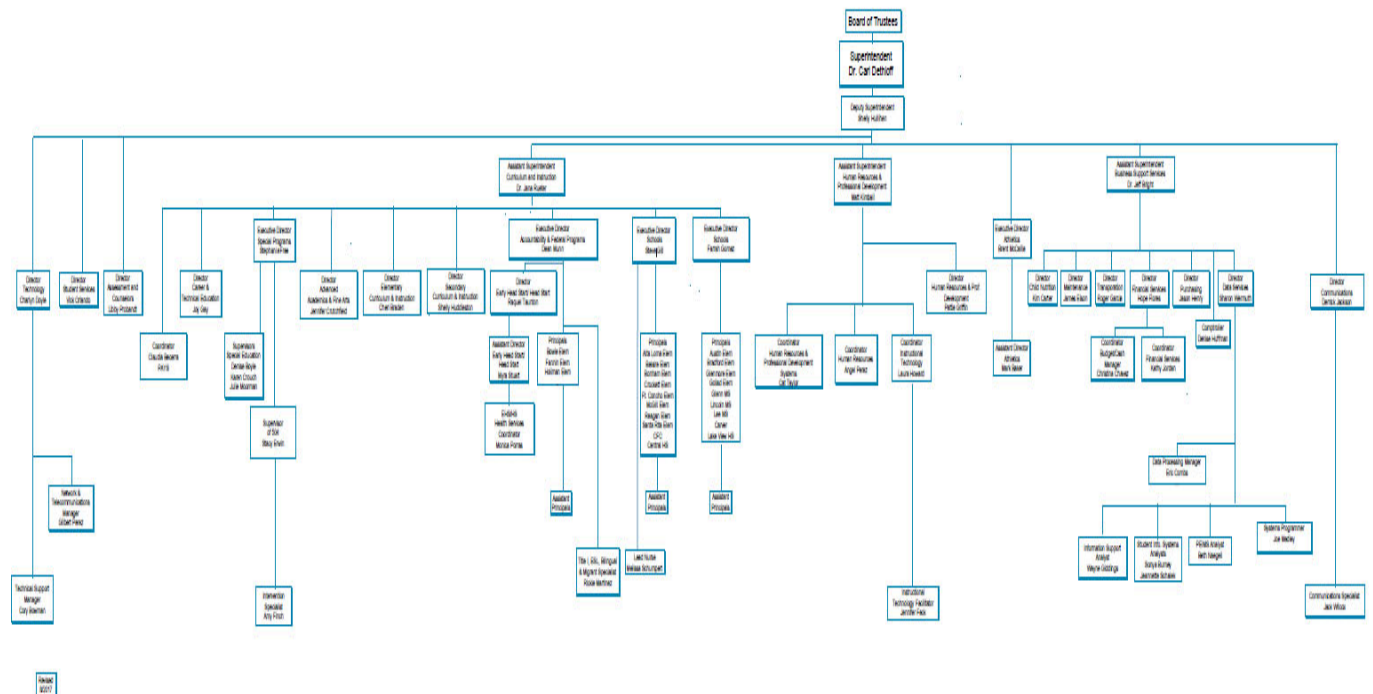
# General Information

The district has established fiscal procedures that apply to all financial transactions regardless of the funding source. **Procedures that relate directly and/or indirectly to federal and state grant compliance are indicated with a (†).** A separate section in this manual will include specific procedures related to acquiring, expending, and managing grant funds. This manual describes in detail the district's financial management system, including cash management procedures, procurement policies, inventory management, procedures for determining allowable and allocable expenditures, time and effort reporting, record retention and grant information.

In accordance with School Board Policy, [BP Local](#), the Superintendent and administrative staff shall be responsible for developing and enforcing procedures for the operation of the District. These procedures shall constitute the administrative regulations of the District and shall consist of guidelines, handbooks, manuals, forms, and any other documents defining standard operating procedures. The Superintendent shall approve this Federal and State Grants Manual on an annual basis, or as appropriate, if federal, state or local changes in regulations or policy warrant immediate changes. This manual is also subject to Board review.

Although this manual is not all-inclusive and cannot address all situations, it does provide general information to assist with standard financial operations and grants management. All SAISD personnel with financial duties and program-specific fiscal duties are responsible for the contents.

## San Angelo ISD Organizational Chart



## Waste, Fraud, and Abuse

To ensure the public receives the most value, the district makes every effort to ensure its administrative management of public and federal funds is as effective and efficient as possible, with a high standard of accountability to prevent waste, fraud, and abuse.

All trustees, employees, vendors, contractors, consultants, volunteers, and any other parties who are involved in the district's financial transactions shall act with integrity and diligence in duties involving the district's financial resources - [CAA \(Local\)](#).

The district prohibits fraud and financial impropriety, as defined below, in the actions of its trustees, employees, vendors, contractors, consultants, volunteers and others seeking or maintain a business relationship with the district.

Fraud and financial impropriety includes, but is not limited to:

- Forgery or unauthorized alteration of any document or account belonging to the district;
- Forgery or unauthorized alteration of a check, bank draft, or any other financial document;
- Misappropriation of funds, securities, supplies, or other district assets, including employee time;
- Impropriety in the handling of money or reporting of district financial transactions;
- Profiteering as a result of insider knowledge of district information or activities;
- Unauthorized disclosure of confidential or proprietary information to outside parties;
- Unauthorized disclosure of investment activities engaged in or contemplated by the district;
- Accepting or seeking anything of material value from contractors, vendors, or other persons providing services or materials to the district;
  - Destroying, removing, or inappropriately using records, furniture, fixtures, or equipment;
  - Failure to provide financial records required by state and local entities;
  - Failure to disclose conflicts of interest as required by policy; and
  - Any other dishonest act regarding the finances of the district.

Any person who suspects fraud or financial impropriety shall report the suspicions immediately to any supervisor, the Superintendent or designee, the Board President, or local law enforcement. Visit our district site at [[Waste, Fraud, and Abuse](#)] for more information.

## **Business, Federal & State Departments Mission**

*The Mission of the San Angelo Independent School District Business, Federal and State Departments is to provide support to all District stakeholders: students, staff, parents, and community to guarantee all business and fiscal operations are aligned to the instructional goals and objectives of the district.*

Operational excellence will be maintained and all financial transactions will be performed in accordance with generally accepted accounting practices.

## **Business Department Staff**

The Business Department staff shall perform multiple roles; however, adequate controls of separation of duties shall be maintained at all times. The staff consists of:

Dr. George McFarland	Assistant Superintendent of Business Services	Ext. 766
Hope Flores	Director of Financial Services	Ext. 793
Jason Henry	Director of Purchasing	Ext. 759
Jaime Guerrero	Comptroller	Ext. 780
Kathy Jordan	Coordinator of Financial Services	Ext. 789
Christina Chavez	Coordinator of Budget/Cash Manager	Ext. 799

## **Federal/State Grant Managers**

Shelly Huddleston	Executive Director of Schools & SCE	Ext. 523
Shelly Hullihen	Deputy Superintendent of Admin. Services/ Title IX Coordinator	Ext. 507
Raquel Taunton	Director of Federal Programs	Ext. 704
Dian Underwood	Director of Special Programs	325-659-4055
Michelle Helms	Director of Child Nutrition	325-659-3615
Roxanne Fentress	Director of Career & Technical Ed.	325-481-8305
Dr. Jason Skelton	Director of Safe Schools & Student Services	Ext. 770
Tiffany Huebner	Director of Advanced Academics	Ext. 726
Christy Diego	Director of Bilingual & English Language Learners	Ext. 798
Myra Stuart	Coordinator of 504	325-659-4055

## **Human Resources Department**

Dr. Farrah Gomez	Assistant Superintendent of Human Resources & PD	Ext. 718
Pattie Griffin	Director of Human Resources	Ext. 173
Angel Perez	Coordinator of Human Resources	Ext. 774
Laura Howard	Coordinator of Human Resources	Ext. 510

All Business, Federal and State, and Human Resources Department staff are expected to comply with the:

- Code of Ethics and Standard Practices for Texas Educators [[Board Policy DH \(Exhibit\)](#)],
- School Board Policies, specifically, [CAA Local](#) regarding fraud,
- San Angelo ISD sub manuals and procedures,
- San Angelo ISD Code of Conduct ([Employee Handbook](#)),
- Confidentiality Agreement, and San Angelo ISD Technology Acceptable Use Guidelines

Each staff member shall have an up-to-date job description on file in the Human Resources department. In addition, each staff member should receive and sign a corresponding evaluation instrument during the annual evaluation process. Changes to job descriptions should be made when substantial changes occur in job duties or responsibilities. All Federal and State funded personnel will sign a job description annually.

### **Financial Management System (†)**

San Angelo ISD will maintain a proper financial management system in order to receive both direct and state-administered grants and to expend funds associated with state and federal grant awards. Certain fiscal controls and procedures must be in place to ensure that all financial management system requirements are met. San Angelo ISD understands that failure to meet a requirement may result in return of funds or termination of the award.

San Angelo ISD's financial management system provides for accurate, current, and complete disclosure of the financial results of each grant project. The system adequately identifies the funding source and use of funds and contains information pertaining to grant awards, authorizations, obligations, unobligated balances, assets, outlays (expenditures), income, and interest. The financial accounting system accommodates the minimum 15-digit account code mandated by FASRG, can generate information needed for PEIMS (Public Education Information Management System) reporting, and ensures adequate accountability of State and federal funds.

### **General Ledger Maintenance (†)**

General ledger entries shall be made on an on-going basis as needed. End-of-the-month and end-of-the-year entries shall be made on a timely basis. End-of-the-year entries shall be made prior to the audit field work by the district's external audit firm, Eide Bailey.

The Business Services Department shall be responsible for monitoring the general ledger maintenance on a monthly basis. The general ledger shall be reviewed for accuracy in areas such as, but not limited to the following:

- Cash and investment balances equal the respective bank or investment monthly statements
- Aged purchase orders, receivables and payables
- Verify that fund accounts are in balance
- Verify that bank account reconciling items are posted to the general ledger

### **Journal Entries (†)**

All general ledger entries shall be in balance (debits shall equal credits). A Journal Voucher form shall be used to document all entries. All journal entries shall be numbered for tracking purposes. A systematic numbering system shall be utilized by the district. The Director of Finance, Comptroller, or Cash Manager/Budget Coordinator shall be authorized to create journal entries and the Cash Receipts/Bank Reconciliation Clerk shall be authorized to post journal entries to the general ledger.

The Cash Receipts/Bank Reconciliation Clerk also creates re-occurring cost allocations entries and cash receipts and banking transaction entries.



All payroll general journals shall be interfaced to the finance system by the payroll department. The payroll clerks shall verify that the pre-post payroll general journals and the finance payroll general journals in balance and posted accurately to the general ledger. All payroll general journals must be posted to the finance general ledger no later than the actual pay date.

All changes to the general ledger should be posted within the same month as the changes occurred, if possible, or as soon as practicable. At times, prior to closing the month, additional reconciling journal entries may be posted in accordance with the creation and approval guidelines.

School Board Reports and a detailed check payments report for the previous month should be generated and forwarded to the Superintendent for board review. The financial reports and check payment list shall not be approved by the School Board.

All reports are maintained in the accounting system for audit purposes including, but not limited to, the following:

- Cash General Journal
- General Journal
- Check Payments & Check Register
- Detail General Ledger
- Summary General Ledger

The Comptroller shall review reports and transaction analysis on a monthly basis to ensure the accuracy of fund accounting.

### **Data Entry and Validation (†)**

All data entry shall be from the appropriate source document(s). All data entry shall be validated (verified) with the source documents. A system of checks and balances shall be in place to ensure that all postings to the general ledger result in the desired outcome. For example, a cash receipt journal shall be validated to ensure that the total amount deposited matches the posted cash receipt journal.

Ongoing, daily data entry validation greatly increases the accuracy of the fund accounting and facilitates reconciliation of the monthly bank statements with the general ledger.

### **General Ledger Transaction – (†)**

All general ledger financial transactions shall require the following minimum data:

- Date of the general ledger transaction – the date of the transaction should be within the posting month and within the posting fiscal year.
- Account code(s) – the proper account code shall be used for all transactions.
- Journal [transaction] number – the number assigned should be manually or automatically assigned in a sequential order. A log of the journal numbers utilized each fiscal year should be available in a manual or automated form. Automated, system-generated general ledger entries shall be easily distinguished from manual general ledger entries.
- The credit and debit amounts– the total debits must match the total credits.

- Reason for the general ledger transaction – the reason should explain the reason for the transaction such as cash receipt number, adjustment to budget/expense, etc.
- Supporting document – supporting documentation, if any, shall be attached to the journal entry form for audit tracking purposes.
- Signature or initials, as appropriate
- Signature or initials of the appropriate approval(s)
- Signature or initials of the individual posting the transaction.

All general ledger payroll transactions shall require the following minimum data:

- Check date – the system-generated general ledger transaction should reflect the check date as a part of the journal entry number.
- Account code(s) – the account codes charged for all payroll disbursements, including liability accounts, should exist in the general ledger prior to posting the system-generated journal entries. [Note: During the payroll posting process, the payroll department must print and verify that all payroll accounts exist on the general ledger. If accounts do not exist on the general ledger, the accounts should be verified for accuracy and if accurate, the list of account codes must be submitted to the Director of Finance to ensure that the appropriate accounts are created in the finance system.

## **Cash Management Processes**

San Angelo ISD business department and federal programs staff shall adhere to the Cash Management Procedures.

### **End of Month Process**

Within 20 days after the end of the month, all end-of-month reports should be printed and verified and the end-of-month process completed.

The E Finance Plus Database (system) reports transactions in real time immediately when they are posted.

The transactions are summarized for reporting purposes into periods that equate the calendar months.

On the first day of the month, the Cash Receipts Clerk changes the period in the system to allow for the new month's aggregation. Entries can be posted in the prior period by changing the period back for the posting. That is done by the Cash Receipts Clerk only, in order to post interest earnings in the month earned and final food service deposits for the month.

The system has internal checks and balances that verify that all entries are in balance and does not allow posting of unbalanced entries nor encumbrances or payments that would exceed budget balances.

The bank statements are promptly reconciled by the Cash Receipts Clerk and reviewed by the Comptroller.

Monthly analysis of payroll accounts and general ledger accounts is performed by the Comptroller. The Cash Manager/Budget Coordinator prepares monthly financial reports for the Board of Trustees (the Board). The Director of Finance prepares monthly budget status reports for the Board. Monthly financial

reports including (non-payroll) check registers are posted on the District website after presentation to the Board.

All financial information (current and 10 years prior) is kept in the system and is accessible at any time. No additional paper nor electronic historical snapshot reports are required to be stored.

The system carries 13 periods for each fiscal year, to allow final year end entries to be made to the prior fiscal year after the new fiscal year has been opened in the system.

After year end, interim closing procedures (system generated) are initiated monthly by the Director of Finance, allowing the revenues and expenditures to date to be closed into fund balance. Typically there are 3 to 4 months of interim closes performed as the financial information is completed and year-end adjustments are posted. The Comptroller prepares an electronic trial balance for audit by an independent audit firm. The auditors are given summarized electronic data as well as access to the financial system for research of detail information. When the audit is complete and year end financials have been prepared by the Comptroller in collaboration with the external auditor, the final system close is initiated by the Director of Finance.

A Comprehensive Annual Financial Report (CAFR) is prepared collaboratively by the Comptroller and the independent audit firm. After approval by the Board, the CAFR is filed with Texas Education Agency and other reporting agencies and made available to the public on the District's Website.

After the Comptroller verifies that all accounts are in agreement with the audited financials the year end final system closing process is initiated by the Director of Finance.

## **End of Fiscal Year Process**

All changes to the general ledger should be posted within the same month as the changes occurred, if possible, or as soon as practicable. Within 30 days after the fiscal year, all end-of-fiscal year reports should be printed and verified for audit purposes.

All end-of-fiscal year adjustments should be posted to the general ledger prior to closing out the fiscal year.

## **Segregation of Duties (†)**

At a minimum, the business office staff shall operate under a segregation of duties, including but not limited to, the following:

- Endorsement of checks – The same staff member shall not prepare and endorse accounts payable or payroll checks.
- Bank reconciliations – The same staff member shall not prepare cash disbursements, cash deposits, or other cash transactions and reconcile the district's bank accounts.
- Maintain non-cash accounting records – The same staff member shall not prepare non-cash general ledger transactions and post the transactions to the general ledger.

- Purchasing and Receiving functions – The same staff member shall not serve as the final approver of a purchase order and verify receipt of the goods.
- Contract Management – The same staff member shall not approve a contract for goods or services and have sole approval authority to disburse the payment for the contracted goods or services.

## **Retention of Records (†)**

In accordance with Board Policy [CPC Legal and Local](#), all financial records for the current fiscal year shall be retained for audit purposes in accordance with the district Local Records Retention Schedule. Destruction of records, and the expiration of the records, shall also be in accordance with the district's Local Records Retention Schedule. Unless a record that has been destroyed is specifically listed on a Destruction Schedule, it is presumed to still exist.

The U.S. Department of Education is authorized to recover any federal funds misspent within 5 years before the receipt of a program determination letter. 34 CFR §81.31(c). New state law went into effect on September 2015 requiring record retention of contracts to be 7 years past closing. Consequently, the district shall retain records for a minimum of seven (7) years from the date on which the final Financial Status Report is submitted, unless otherwise notified in writing to extend the retention period by the awarding agency, cognizant agency for audit, oversight agency for audit, or cognizant agency for indirect costs. However, if any litigation, claim, or audit is started before the expiration of the record retention period, the records will be retained until all litigation, claims, or audit findings involving the records have been resolved and final action taken. (2 CFR §200.333).

The Government Code, Section 411.158, provides that the Texas State Library and Archives Commission shall issue records retention schedules for each type of local government, including a schedule for records common to all types of local government. The law provides further that each schedule must state the retention period prescribed by Federal or State law, rule of court, or regulation for a record for which a period is prescribed; and prescribe retention periods for all other records, which periods have the same effect as if prescribed by law after the records retention schedule is adopted as a rule of the Commission. The Texas State Library and Archives Commission records retention schedules are available at: [www.tsl.state.tx.us/slr/recordspubs/localretention.html](http://www.tsl.state.tx.us/slr/recordspubs/localretention.html).

San Angelo ISD shall maintain grant-related records in a combination of paper and electronic formats for seven years from the end of a grant period.

The following records shall be maintained in paper format:

- All grant related required documentation and supporting information
- Required grant related forms with original signatures
- Initial Requisition Requests
- Time and Effort Documentation
- Job Descriptions
- Sign-In Sheets, Agenda's, and Meeting Minutes
- Employee Evaluations

The following records shall be maintained in electronic format:

- All financial records maintained by E Finance Plus
- Grant Applications
- Compliance Reports
- Acknowledgement of Reasonable Use Guidelines
- Employee Handbook Receipts
- Employee Contracts and Letters of Assurance
- Required Professional Development Records
- Comprehensive Needs Assessment
- Improvement Plans
- Personnel Request Forms

In accordance with federal regulations, the district shall maintain the grant-related records in an open and machine readable format. Specifically, the district shall use the following formats to store electronic data.

- Microsoft products such as Word, Excel, PowerPoint, Access, etc.
- Financial Management System (E Finance Plus), On Data Suite, E School Plus, and Eduphoria.

The Records Custodian for the financial records of the district is the Comptroller and the grant managers. All questions related to the retention, destruction, and/or addition of new record series shall be directed to the Department Records Management Officer (RMO).

### **Data System Security & Access to Records (†)**

Business, Federal and State Program department staff handles and/or processes a substantial amount of confidential information. All staff is strictly prohibited from revealing confidential information to an unauthorized individual. Unless required by Federal, state, and local statute, the district is not required to permit public access to their records. The district shall make all grant-related records available for access to the federal granting agency and/or pass-through entity upon request.

All Business, Federal and State office staff shall sign a Confidentiality Agreement on an annual basis. Among the most critical information is documentation related to employee's Personally-Identifiable Information (PII) such as health, benefits, financial, family members, or other personal information. Violators will be subject to discipline, employment termination, and/or may be reported to the appropriate legal authorities. Violations of some protected information, such as health or medical information, is also protected by federal laws, such as HIPPA.

Unless notified otherwise by the federal granting agency, the district shall retain all financial and program records related to the grant award in accordance with the federal grant. Upon request from the federal granting agency, the district shall transfer the records to the requesting federal agency.

The business office staff shall be authorized to access the districts financial and/or payroll system(s) for job-related purposes only. Use of the systems for personal reasons or benefit will result in disciplinary action, up to and including employment termination.

Each staff member shall take appropriate steps to ensure that their respective computer system is managed in a control environment to prevent unauthorized access. At no time (including lunch breaks) shall a computer system be logged on to a financial data system while unattended by the respective staff member. All computer systems shall revert to a screen lock after at least 30 minutes of nonuse.

### **Assignment of Access and Passwords (†)**

Access to data systems shall be based on the specific job duties and responsibilities of each staff member. Except for limited exceptions, staff will not be given unilateral access to all modules in the financial and payroll system. For example, a payroll staff member will not have access to the human resources system unless the access is limited in scope and “read-only”. These restrictions to unilateral access are designed to prevent complete autonomy which could lead to fraud.

Each staff member shall be responsible for securing their assigned (selected) password. At no time shall passwords be shared with others or posted in visible locations within the staff member’s work space. Violators of this restriction shall be subject to disciplinary action, including but not limited to employment termination.

Data system access to the authorized modules, shall be determined by the Program Administrator, Grant Manager and the Data Processing Manager. Each staff member shall have access to their respective database(s) and tabs within a database based on their position. Security roles will be established and assigned with the specific access to each module. In the event that a staff member gains access, due to human or software error, that he/she is not entitled to, it is the responsibility and duty of the staff member to notify the Security Administrator, or their immediate supervisor, regarding the ability to access the restricted database or module(s).

### **Revoking Access (†)**

Access to data systems are subject to change and/or revocation when changes occur to a staff member’s position, duties or responsibilities. Access to data systems are also subject to revocation when a staff member violates the Responsible Use Guidelines. Each staff member shall sign an Acknowledgement of Reasonable Use Guidelines form every fiscal year.

### **Business, Federal and State Staff Training (†)**

Every staff member will be scheduled to attend at least one training and/or conference opportunity per year. An annual training calendar shall be developed that may include, but is not limited to, topics in the following areas:

- Account coding
- Payroll and Human Resources Compliance Issues
- PEIMS Data Reporting and Quality
- GASB
- Audit requirements
- Legal changes, such as Purchasing
- State and Federal Grants Management
- State and Federal Updates
- Program Specific Conferences (As approved)

- Data system (software)
- Travel Guidelines
- Other job-related area(s) requested by staff member or Superintendent, Assistant Superintendent's, or Executive Director's for growth opportunities

Staff members that have attained TASBO certification status will be afforded an opportunity to attend at least 20 hours per year (for a total of 60 every 3 years) through TASBO or a TASBO-approved CEU provider. Training opportunities for other certification or licensing programs, such as a CPA, shall be provided in a manner that seeks to meet the continuing education requirements for that specific certification or license.

Additional training requests should be submitted to the Assistant Superintendent of Business Services. It is the employee's responsibility to request additional training that he/she feels will be beneficial in performing the assigned job tasks. At times, the immediate supervisor may also recommend or direct that a staff member attend specific training to improve their skills or comply with a "Growth Plan".

In an effort to support compliance of fiscal policies and procedures, the business office shall conduct annual training for campus and department administrative and support staff, as appropriate. The Business Services and Federal/State Departments shall be responsible for developing the training calendar. Critical training areas shall include, but not be limited to:

- Activity Account Management
- Budget Development Process
- Cash Management
- State and Federal Grants Management
- Staffing
- Budget/Allocation Overview

### **State and Federal Grant Management (†)**

The Office for Grants and Fiscal Compliance (GFC) at Texas Education Agency is responsible for managing all discretionary and formula grants, ensuring the agency's compliance with federal grant requirements, and conducting audits and reviews of all local educational agencies (LEAs). The department houses the following divisions:

- Division of Grants Administration  
(formerly the Division of Discretionary Grants and the Division of Formula Funding)
- Division of Federal Program Compliance  
(formerly the Fiscal Accountability and Federal Reporting Unit)
- Division of Financial Compliance  
(formerly housed in the Office for Accreditation)

Compliance with all federal and state grant requirements is essential to ensure that all granted funds remain with the district. Failure to comply with grant requirements may result in denial of reimbursement requests and/or requests from the granting agency to return a portion or in some cases all grant funds. The Texas Education agency acts as the pass-thru entity for many of the United States Department of Education (USDE) federal grants.

## Federal Regulations for Federal Grant Awards

All federal grant funds are subject to the compliance with Administrative Education Department General Administrative Regulations (EDGAR) and Programmatic (NSLP, IDEA, etc.) regulations for each federal grant award. Title 34, Code of Federal Regulations (CFR), Parts 75-79, 81 to 86 and 97-99 EDGAR is currently in transition. For awards made prior to 12/26/2014, EDGAR Parts 74 and 80 still apply. For awards made on or after 12/26/2014, 2 CFR Part 200, which includes the substance formerly in parts 74 and 80, applies. For state-administered federal grants, TEA shall notify the district on the Notice of Grant Award (NOGA) of the applicable administrative regulations. The State and Federal Grants Addendum contains guidance for pre-December 26, 2014 federal grant awards. The date of the award to the district (or pass-through entity such as TEA) shall determine the appropriate regulations.

When the district's local policies and/or procedures conflict with the federal regulations, the district shall comply with the more restrictive regulations shall be adhered to in all aspects of federal and state grants management.

Overview of the Education Department General Administrative Regulations (EDGAR). The EDGAR, as amended on December 26, 2014, includes five (5) subparts under 2 CFR Part 200 of EDGAR as noted below:

1. Subpart A – Acronyms and Definitions
2. Subpart B – General Provisions
3. Subpart C – Pre-award Requirements
4. Subpart D – Post-award Requirements
5. Subpart E – Cost Principles
6. Subpart F – Audit Requirements
7. Appendices – I through XI

Generally, 2 CFR Part 200 applies to all programs under the Elementary & Secondary Education Act (ESEA) and may apply to other US Department of Education grants. Note: The Title VIII (Impact Aide) Program is specifically excluded from 2 CFR Part 200. [Reference: 34 Part 299.2]

The EDGAR in its entirety can be accessed at: <http://www2.ed.gov/policy/fund/reg/edgarReg/edgar.html> .

To ensure consistency with EDGAR, the district shall utilize the acronyms and definitions included in the EDGAR for general terms related to the management of federal grant funds. The EDGAR Acronyms and Definitions can be found in CFR 200.0 through 200.99.

Programmatic regulations for each of the district's federal grant awards are hyperlinked in the List of Grant Awards for easy access to the Fiscal Guidelines, Allowable Costs, and/or other programmatic regulations.

At the District level, managing State and Federal Grants shall be a collaborative process between the Business (Accounting, Budgeting, Finance, Purchasing, Payroll, etc.), Human Resources and Grant Management Departments. Each respective department shall be responsible for their duties and responsibilities as they relate to the management of state and/or federal grants. The duties of each



department are listed below in general terms. Additional, specific duties and responsibilities may be listed within an area of compliance within this Manual.

#### *Business/Finance Department*

- Assisting the Grant Manager with budgeting grants funds. Preparing and posting the initial budget and all amendments to the general ledger.
- Assisting the Human Resources department with determining the payroll distribution code(s) for all grant-funded staff.
- Preparing all grant-related financial reports (monthly, quarterly and/or annual).
- Preparing all financial records for the annual financial audit and single audit, as appropriate.
- Ensuring compliance with the FASRG in coding all payroll and non-payroll expenditures.
- Adjusting the general ledger, as appropriate, after the Grant Manager's reconciliation of the time and effort reports, as appropriate if adjustments are necessary.
- Managing the day-to-day cash needs for grant expenditures and drawing-down cash reimbursements, as appropriate.
- Managing all purchasing and contractual commitments in compliance with the grant periods and allowable cost principles.
- Retaining all financial records for the required length of time (7 years) for audit purposes.
- Managing all fixed assets and ensuring compliance with the inventory and disposition federal guidelines.

#### *Human Resources Department*

- Assisting the Grant Manager with the recruitment and hiring of all grant-funded staff.
- Ensuring that all grant-funded staff meet the Highly Qualified Staff federal guidelines, as appropriate (And, all state certification requirements).
- Ensuring that all grant-funded staff have a job description with the grant-related duties and funding. (And, that all grant-funded staff sign a job description on an annual basis).
- Preparing the Highly Qualified Staff Annual Report and conducting the required public notice or hearing, as appropriate.
- Maintaining audit-ready HR employee files for financial audit or single audit purposes, as appropriate.
- Developing and maintaining all salary schedules to ensure consistency between local and non-local pay rates (Includes base salaries, stipends and extra-duty rates of pay).
- Assisting the Grant Manager with determining the position title, Role ID and other salary information for use in completing the grant application.
- Retaining all personnel records for the required length of time (5 years) for audit purposes.

#### *Grant Management or Special Program Department Manager*

- Working cooperatively with the campus administrative staff to ensure that all grant activities are collaboratively planned and appropriate to each campus.
- Providing supporting documentation for budgeted grants funds. And, submitting all grant amendments to the business department to facilitate budget amendments.

- Assisting the Human Resources department with determining the payroll distribution code(s) for all grant-funded staff.
- Preparing all grant-related programmatic (evaluation) reports (monthly, quarterly and/or annual).
- Ensuring compliance with the FASRG in coding all payroll and non-payroll expenditures.
- Receiving and monitoring the time and effort reports, as appropriate, and submitting adjustments, if any, to the business department.
- Monitoring the spending thresholds throughout the grant period to ensure that the grant activities are being conducted systematically throughout the grant period.
- Reviewing and approving all purchasing and contractual commitments in compliance with the grant periods and allowable cost principles.
- Retaining all grant records for the required length of time (7 years) for audit purposes.
  - Providing information to the Human Resources department regarding the number and type of grant-funded positions approved in the grant application by the granting authority.
  - Verifying with the HR department that all grant-funded staff meet the Highly Qualified Staff federal guidelines, as appropriate (And, all state certification requirements).
  - Verifying with the HR department that all grant-funded staff have a job description with the grant-related duties and funding. (And, that all grant-funded staff sign a job description on an annual basis).
  - Verifying with the HR department that the Highly Qualified Staff Annual Report and conducting the required public notice or hearing, as appropriate.
  - Assisting the HR department with determining the position title, Role ID and other salary information for use in completing the grant application.

*Payroll Department*

- Maintaining audit-ready payroll employee files for financial audit or single audit purposes, as appropriate.
- Retaining all payroll records for the required length of time (7 years) for audit purposes.
- Assisting the Human Resources & Grants departments with determining the payroll distribution code(s) for all grant-funded staff.

All departments shall provide staff training for their respective staff and other staff, as appropriate, regarding the grant management duties and responsibilities for each staff member.

## **900 – State and Federal Programs/Grants (†)**

### **901 State Programs – Allotments**

State Program allotments are estimated and paid to school districts through a Summary of Finance template created by the Texas Education Agency. The actual state allotments are calculated as noted below in each respective section. A settle-up process occurs at the end of each fiscal year – funds owed to a district are paid by TEA and funds owed by a district are paid to TEA (or TEA reduces the following fiscal year funds by the amount owed to the state).

A percentage of each state allotment must be spent on “direct” expenditures for the given special program. The current percentages and program intent code (PIC) are noted below by program:

- Special Education 52% PIC 23
- Career & Technical Education 58% PIC 22
- Gifted & Talented Education 55% PIC 21
- State Compensatory Education (SCE) 52% PIC 24-30 (except 25& 27)
- Bilingual/ESL Education 52% PIC 25

**Note.** The district shall not use PIC 30 – neither of the campuses operate a Title I Schoolwide Program.

During the budget process, the estimated state allotment shall be calculated by the Assistant Superintendent of Business Services based on prior year special program enrollment and average daily attendance (ADA). The estimated state allotment by special program shall be provided to the Special Program Administrator(s) as noted below. These special program administrators shall be responsible for the programmatic compliance in their respective program(s). Programmatic compliance shall include, but not limited to: program eligibility, program design, instructional delivery, entry/exit procedures, professional development, certification, and program monitoring.

- Special Education Dian Underwood
- Career & Technical Education Roxanne Fentress
- Gifted & Talented Education Tiffany Huebner
- State Compensatory Education (SCE) Shelly Huddleston
- Bilingual/ESL Education Christy Diego

The business department, specifically the, Assistant Superintendent of Business Services and the Director of Finance, shall be responsible for the financial compliance in each of these special programs. Financial compliance shall include, but not limited to: budgeting development & monitoring, approval of expenditures, financial reporting to TEA, financial audit, and documentation and record retention.

As part of the budget adoption process, the Assistant Superintendent of Business Services shall verify that the proposed budget includes appropriations in each of the special programs of *no less* than the percentages stated above as required direct expenditures for each special program.

Throughout the fiscal year and at the end of the fiscal year, the Director of Financial Services, shall calculate the periodic and final spend percentages for each special program. The allocated expenditures by program intent code (PIC) shall be used to determine compliance. In the event that direct expenditures fall below the mandated percentages, the Director of Finance shall ensure that the deficit amount is budgeted in the following fiscal year.

The mandated program intent codes (as defined in the FASRG) are classified as Basic or Enhanced. The PICs in these classifications for regular and special program allotments are noted below:

Basic Services – PIC 1X

- PIC 11 Basic Educational Services

Enhanced Services – PIC 2X – 3X

- PIC 21 Gifted & Talented
- PIC 22 Career & Technical Education
- PIC 23 Special Education
- PIC 24 Accelerated Education (State Compensatory Education)
- PIC 25 Bilingual and ESL Education
- PIC 26 Non-Disciplinary Alternative Education Program
- PIC 28 Disciplinary Alternative Education Program – Basic
- PIC 29 Disciplinary Alternative Education Program – SCE Supplemental
- PIC 30 Title I, Part A Schoolwide Activities related to SCE (Campuses with 45% or more educationally disadvantaged students)

If the “intent” of particular course or program is one of the Enhanced Services, the appropriate PIC shall be used for the expenditures even if an incidental student(s) benefit from the program. For example, the salary of a Bilingual Instructional Aide should be paid 100% from PIC 25, if the intent of his/her position is to support Bilingual students even though 1 or 2 non-Bilingual students also benefit from a small group instructional setting.

At the beginning of each school year, the salaries of all staff should be determined based on their position and assignment. Specifically, we need to know the following:

- What the employee will do? Determines the function code
- Where the employee will work? Determines the organization code (may be split)
- Who will benefit? Determines the population served or PIC (may be split)

Determining the correct payroll account distribution code(s) is critical to ensure that all payroll costs are expensed in the correct account code(s). This is extremely important for staff assigned on a partial or full time basis to support a special program. Only the payroll costs for services whose intent is to serve one or more special program may be charged to the special program PIC.

By early September, each school year, the Campus Principal shall prepare a Staff FTEs report that is based on the campus Master Schedule. The Staff FTE (HMR) report shall reflect the names of all staff, the position, and the assignment(s) by PIC code. For example, a teacher that teaches 4 special education classes and 4 career and technical education courses, should have .5 FTEs in PIC 23 and .5 FTEs in PIC 22. [Note. The master schedule shall reflect the teaching assignment for all teachers and every course section shall reflect the “intent”, or population served code. The population served codes (**PEIMS Population Served Code Table 030**) and program intent codes are correlated below:

- Population Served Code 04 PIC 21 Gifted & Talented
- Population Served Code 05 PIC 22 Career & Technical Education
- Population Served Code 06 PIC 23 Special Education
- Population Served Code 03 PIC 24 Accelerated Education (State Compensatory Education)
- Population Served Code 02 PIC 25 Bilingual Education

- Population Served Code 07    PIC 25            ESL Education
- Population Served Code 03    PIC 26            Non-Disciplinary Alternative Education Program
- Population Served Code 03    PIC 28            Disciplinary Alternative Education Program – Basic
- Population Served Code 03    PIC 29            Disciplinary Alternative Education Program – SCE Supplemental
- Population Served Code 03    PIC 30            Title I, Part A Schoolwide Activities related to SCE (Campuses with 45% or more educationally disadvantaged students)

All staff assigned to support all students, not specifically served in a special program, shall be coded as basic population served (01) and the basic program intent code (11).

Special Program Administrators shall also submit a Staff FTE report for non-campus administrative staff by September 1st at the beginning of each fiscal year. The PIC codes for the non-campus staff shall reflect what they do, where they are assigned to work, and the special program(s) that they support.

The Staff FTEs reports shall be submitted to the Human Resources Department no later than the deadline of September 1st at the beginning of each fiscal year. The Program Administrators along with the Human Resources and Business Departments shall verify the Staff FTEs and ensure that funds are budgeted in the appropriate payroll account codes. Budget changes and/or amendments, if any, shall be prepared by the Executive Director of Federal Programs & Accountability and the Federal Program Specialist. [Note. The minimum spend percentages shall be verified again to ensure that the budgeted amount by PIC still meets or exceeds the minimum spend percentage by special program.]

After approval of the Staff FTEs reports, the Human Resources Department shall submit the Staff FTEs to the business department Cash Manager/Budget Coordinator for the purpose of updating the payroll distribution record(s) of each district employee.

Campus Principals and Special Program Administrators shall be responsible to ensure that any changes to staff assignments are submitted to the Human Resources Department within five (5) days of the assignment change. The prior process of verifying the FTEs/account codes, approval of the FTE report, and submission of the reports to the payroll department shall occur upon the receipt of assignment changes.

### **901.1 Gifted and Talented**

The Gifted and Talented program must adhere to state law, Texas Education Code (TEC) 29.121 and TEC 42.156. Chapter 29 addresses the programmatic guidelines related to eligibility, identification, and program services. Chapter 42 addresses the funding weight(s) and allowable costs.

Specifically, each school district shall identify students eligible for the GT program and serve the students in an appropriate manner to obtain state funds. All student identification and enrollment shall meet the special program guidelines in the Student Attendance Accounting Handbook (SAAH). Student enrollment data shall be submitted to TEA through the PEIMS Fall Submission as of the snapshot date. The attendance and/or contact hour data for funding purposes shall be submitted to TEA through the PEIMS Summer Submission.

The Special Program Administrator with oversight responsibility to certify the Gifted & Talented special program data prior to submission to TEA shall be the Director of Advanced Academics.

## **901.2 Career and Technical Education (CATE)**

The Career and Technical Education program must adhere to state law, Texas Education Code (TEC) 29.181 and TEC 42.154. Chapter 29 addresses the programmatic guidelines related to eligibility, identification, and program services. Chapter 42 addresses the funding weight(s) and allowable costs.

Specifically, each school district shall identify students eligible for the CTE program and serve the students in an appropriate manner to obtain state funds. The Master Schedule shall serve as the official document to support that each student was enrolled in a CTE course. All student identification and enrollment shall meet the special program guidelines in the Student Attendance Accounting Handbook (SAAH). Student enrollment data shall be submitted to TEA through the PEIMS Fall Submission as of the snapshot date. The attendance and/or contact hour data for funding purposes shall be submitted to TEA through the PEIMS Summer Submission.

The Special Program Administrator with oversight responsibility to certify the CTE special program data prior to submission to TEA shall be the Director of Career and Technical Education.

## **901.3 Special Education**

The Special Education program must adhere to state law, Texas Education Code (TEC) 29.003 and TEC 42.151. Chapter 29 addresses the programmatic guidelines related to eligibility, identification, and program services. Chapter 42 addresses the funding weight(s) and allowable costs.

Specifically, each school district shall identify students eligible for the Special Education program and serve the students in an appropriate manner to obtain state funds. The student's Individualized Education Plan (IEP) shall serve as the official document to support that each student is eligible for special education, the type of instructional arrangement, and the number of contact hours to be served in a special education setting. All student identification and enrollment shall meet the special program guidelines in the Student Attendance Accounting Handbook (SAAH). Student enrollment data shall be submitted to TEA through the PEIMS Fall Submission as of the snapshot date. The attendance and/or contact hour data for funding purposes shall be submitted to TEA through the PEIMS Summer Submission.

The Special Program Administrator with oversight responsibility to certify the Special Education program data prior to submission to TEA shall be the Director of Special Programs.

## **901.4 Compensatory Education (SCE)**

The Compensatory Education program must adhere to state law, Texas Education Code (TEC) 29.081 and TEC 42.152. Chapter 29 addresses the programmatic guidelines related to eligibility, "at risk" identification, and program services. Chapter 42 addresses the funding formula and allowable costs. The SCE program is funded based on the highest six (6) months of free and reduced lunch eligibility students in the prior school year. The Director of Child Nutrition shall provide the monthly counts of free and reduced lunch eligibility to the business department, on a monthly basis for the purposes of estimating SCE funds in the next fiscal year.

Specifically, each school district shall identify students eligible for the Compensatory Education program and serve the students in an appropriate manner to obtain state funds. There are thirteen (13) at risk indicators in state law. The Campus Principal, counselors, and at-risk coordinators at each campus shall

be responsible for identification of all at risk students. The at-risk student enrollment shall be reported to TEA through the PEIMS Fall Submission.

The SCE program compliance is unlike the other special programs in that it requires specific documentation as outlined in the Financial Accounting System Resource Guide (FASRG) Module 9. The District Improvement Plan (DIP) and Campus Improvement Plans (CIP) are the primary source of documentation for the expenditure of SCE funds. According to TEA, annually within **150 days** after the last day permissible to send data for the PEIMS data FINAL Midyear resubmission 2 (typically late July), the District shall electronically submit a PDF version of the DIP and at least two (2) CIPs through the TEASE system. The determination regarding which CIPs to submit to TEA shall be based on the TEA guidelines in the FASRG, Module 9.1.2 Summary of Filing Requirements. The District's submission dates shall be as noted below to ensure compliance with this critical requirement.

- Director of Federal Programs & Campus Principals shall submit the district and campus Comprehensive Needs Assessments by the end of May
- Director of Federal Programs in conjunction with the District site base committee shall submit the District Improvement Plan by the end of May
- Superintendent or designee shall submit the DIP to the School Board for approval by the June Board meeting
- Campus Principals shall submit their CIPs to the Executive Director of Schools & SCE by the end of September
- The Executive Director of Schools & SCE shall submit the DIP and CIPs through TEASE for State Compensatory review by July

Financial guidelines related to supplement not supplant, targeted-assistance versus school-wide campus expenditures, staffing formulas, job descriptions, time and effort, student counts, local identification criteria and allowable costs are described in Module 9 State Compensatory Education.

### **901.5 Bilingual and ESL**

The Bilingual and ESL program must adhere to state law, Texas Education Code (TEC) 29.053 and TEC 42.153. Chapter 29 addresses the programmatic guidelines related to eligibility, identification, and program services. Chapter 42 addresses the funding weight(s) and allowable costs.

Specifically, each school district shall identify students eligible for the Bilingual or ESL program and serve the students in an appropriate manner to obtain state funds. All student identification and enrollment shall meet the special program guidelines in the Student Attendance Accounting Handbook (SAAH). Student enrollment data shall be submitted to TEA through the PEIMS Fall Submission as of the snapshot date. The attendance and/or contact hour data for funding purposes shall be submitted to TEA through the PEIMS Summer Submission.

The Special Program Administrator with oversight responsibility to certify the Bilingual and ESL special program data prior to submission to TEA shall be the Director of Bilingual & English Learner Services.

### **902 Federal Grants**

Acronyms and definitions related to federal grant management are listed in the EDGAR, Subpart A, 200.1 through 200.99 and may be accessed at: <http://www.ecfr.gov/cgi-bin/text-idx?SID=bce3e6e14adb00a7863cc39935f3e35e&node=sg2.1.200.a.sg0&rgn=div7>



These acronyms and definitions are used throughout this manual. One of the most critical definitions is that of a “**non-federal entity**”. When this definition is used it refers to the “**school district**”, as a recipient of a federal grant award.

### **General Provisions (Conflict of Interest & Disclosure):**

The District shall comply with all General Provisions of EDGAR (Subpart B). Specific areas of compliance are noted below:

1. The District has established a conflict of interest policies [School Board Policy BBFA, CAA and DBD). These policies shall also apply to all federal grant awards. The same conflict of interest questionnaire that is used for other district functions shall be utilized for compliance with this provision. The Local Government Officer Conflicts Disclosure Statement shall be completed by all district staff involved in federal grant awards: Superintendent, Business Department, Human Resources, Purchasing, and the Grant Managers. Conflicts of interest, if any are reported, shall be posted on the district’s website and reported to the granting agency. The Director of Federal Programs shall be responsible for overseeing and collecting the conflict of interest questionnaires.
2. The district shall comply with all additional conflict of interest requirements required by the federal granting agency and/or the pass-through entity (TEA).
  - a. The District shall disclose in writing to the granting agency and/or pass-through entities any potential conflict of interest concerning the expenditure of federal or state grant funds. The TEA Division of Grants Administration Conflict of Interest Disclosure Form shall be used disclose the potential conflict.
  - b. The District shall disclose in writing to the granting agency and/or pass-through entities any violations of federal criminal law including fraud, bribery or gratuity violations affecting a federal grant award. Upon detection of any fraud, abuse or waste with federal grant funds, the District shall promptly notify the proper legal authorities and pursue appropriate criminal and/or civil actions. The TEA Division of Grants Administration Conflict of Interest Disclosure Form shall be used to disclose the violation(s).
  - c. The Executive Director of Federal Programs & Accountability shall be responsible for overseeing, reporting and documenting any fraud, abuse or waste of federal grant funds.
  - d. The Superintendent shall be responsible for completing the Certification Statement on the TEA Division of Grants Administration Conflict of Interest Forms.
  - e. The District shall reclassify fraudulent expenditures made with federal grant awards to local district funds, i.e. the General Fund.

#### Conflict of Interest Forms:

- [Conflict of Interest Disclosure – Texas Ethics Commission](#)
- [Conflict of Interest Disclosure Form – TEA Division of Grants Administration](#)
- [Mandatory Disclosure Form – TEA Division of Grants Administration](#)

All district employees are prohibited from soliciting gifts or tokens from vendors or other parties who are affected by (or have an interest in) a federal grant award.

In addition, all district employees are prohibited from accepting unsolicited gifts or tokens from vendors or other parties who are affected by (or have an interest in) a federal grant award that exceed an nominal



(individual) value of \$25.00 and an aggregate value of \$100.00 in a fiscal year. The unsolicited gifts or tokens may not include the following:

- Items prohibited at a public elementary and secondary schools such as drugs, tobacco or alcohol products
- Vendor gifts or awards
- Gift Cards

District employees who violate this administrative directive shall be subject to disciplinary action, up to and including termination of employment with the district. Violations that exceed the federal Conflict of Interest thresholds shall be reported to the federal granting agency and/or pass-through entity by the Director of Federal Programs or the Superintendent.

### **Pre-Federal Award Requirements:**

The federal awarding agency and pass-through entities are required to evaluate the risk of the District in respect to financial stability, quality of management system, history of performance (grants), audit reports and ability to effectively implement the grant program.

The District shall implement strategies as noted below to ensure that its risk level for federal grants management is determined to be “low”:

- Timely submission of all required programmatic and financial reports.
- Complying with the federal grant award fiscal guidelines and allowable cost principles.
- Ensuring that all grant-related staff are properly trained in their respective grants management role on at least an annual basis.
- Implementing grant management procedures and internal controls.
- Staying informed and updated on all federal grant regulations and guidance.

If the District is determined to be a “high risk” district, it shall comply with all of the additional requirements as imposed by the federal granting agency and/or pass-through entity. In addition, the District shall develop and implement strategies to correct the identified deficiencies in an effort to move to a “low risk” entity status.

No pre-award expenses shall be made by the District prior to the approval of the federal granting agency or pass-through entity. Non-authorized pre-award expenses, if any, shall be paid from local District funds, i.e. the General Fund.

### **Budgeting for Federal and State Grants**

#### *The Planning Phase: Meetings and Discussions*

Grant programs are unique and have different program and fiscal requirements. The unique character of grant funds results from both the difference in authority over grant funds and their restriction to specific purposes. Therefore, specific program budgets are prepared for each grant. The grant budget is based on

how the grant funds can best aid in the implementation of the program plan. The District will take into consideration the legal considerations that may affect how grant funds can be used.

If the grant program has a “Supplement, Not Supplant” requirement, the entire funding picture for the program is examined to ensure that grant funds are not being used to supplant state, local, or other federal funds, as applicable. The program manager is responsible for ensuring the “Supplement, Not Supplant” requirements are not violated.

If the grant program will be implemented on a Title I schoolwide campus, the planned activities and expenditures must be identified in the schoolwide plan. Conducting activities and expending funds that are not included in the schoolwide plan could result in an audit exception or monitoring finding for the District. Therefore, the program manager is responsible for coordinating with the Title I program director and for ensuring the activities and anticipated expenditures are described in the schoolwide plan.

District personnel conducts a district-wide Comprehensive Needs Assessment (CNA) annually. As part of this process, evaluation findings of programs, outcomes for previous implementations, and prior year budgets are reviewed. This provides input to campus CNA and Campus Improvement Plans (CIPs) as they are updated for the current year. CIP’s are easily accessible through the district website for access by stakeholders within the district. District personnel will conduct a needs analysis utilizing data collected from past school years. The proposed District Improvement Plan (DIP) is updated, reviewed and approved by the Superintendent and School Board. In addition, annual goals and performance measures for the district are finalized.

The following sources are used to develop budgets for Federal grants:

- Historical data based on previous grant year actual budget
- Campus Improvement Plan (CIP)
- Needs Assessments (CNA)
- District Improvement Plan (DIP)
- Staffing Needs
- Grant Requirements
- Carryover Funds, if applicable

#### *Preparation of Budget*

According to TEC 44.002, on or before a date set by the State Board of Education, the superintendent shall prepare, or cause to be prepared, a proposed budget covering all estimated revenue and proposed expenditures of the LEA for the following fiscal year. The budget must be prepared according to generally accepted accounting principles, rules adopted by the State Board of Education, and adopted policies of the board of trustees.

The Assistant Superintendent of Business Services will ensure the budget is prepared in accordance with GAAP (generally accepted accounting principles) and State guidelines. The Director of Finance will develop a budget calendar of critical dates for budget development, submission, and review, including the person or department responsible for each activity listed in the calendar.

According to the TEA 2010 Financial Accountability System Resource Guide (FASRG), Budgeting Module, inclusion of budgets for local, State, and Federal grant programs is not required for a District's officially adopted annual budget; however, budget information for grant programs may be included as a supplement to the official budget. If the District has a policy that requires the approval of grant budgets by the school board, the level of detail at which they are approved is left to the discretion of the local school board. However, the authority to approve a budget or budget amendment for a grant program lies with the granting agency and not with the school board.

Responsibilities for grants submitted via TEA's eGrants applications:

- Budgeting projections are performed by the Program Grant Managers.
- The Program Grant Manager compiles data using the district's Federal Grant spreadsheet to ensure budgeted amounts match allocations
- The Program Grant Manager ensures obligations or expenditures are not incurred prior to submittal of the eGrants application.

Submitting the Grant Application for Federal and State awards:

San Angelo ISD grant managers will submit grant applications to TEA by the due date set by TEA. According to TEA Fiscal Guidelines, eGrants applications must be certified and submitted by an individual who has been authorized by the applicant or grantee organization to enter the organization into a legally binding contractual agreement. The "Authorized Official" is the individual who will represent the applicant or grantee in the event any legal disputes arises. For Districts, this person is usually the Superintendent or Executive Director.

- Data entry into the eGrants application is performed by the Program Grant Managers and is reviewed by the Director of Federal Programs
- The Director of Federal Programs ensures that the LEA meets TEA's deadlines for submittal of grant applications and amendments.
- The Program Grant Manager or Director of Federal Programs certifies and submits the completed eGrants application.

#### **After Receiving the GAN/NOGA for Federal and State Programs Award**

When the NOGA is received, the grant manager will compare the approved NOGA with the grant application to identify any budget revisions TEA may have required before issuing the approval.

The grant manager ensures obligations or expenditures are not incurred prior to the effective date, based on the period of obligation established in EDGAR and based on the effective date of the NOGA.

Throughout the grant period, the budget is used as a control measure. The budget is monitored by the grant manager as expenditures are incurred.

The grant manager ensures expenditures with grant funds are for allowable and allocable costs as approved in the grant application and are used for the intended beneficiaries and program.

### **Amending the Budget for Federal and State Programs**

Budget amendments are requested before expenditures that exceed acceptable limits are incurred, to ensure that the grant remains in compliance with the granting agency's guidelines. In addition, expenditures requiring a budget amendment generally are not allowable if the obligation is incurred before the approval of the amendment. Expenditure monitoring is performed by the grant managers and program staff throughout the grant period as a control measure.

San Angelo ISD follows the TEA guidelines for submitting federal and state grant amendments. The grant manager monitors the deadlines for each grant to ensure amendments are submitted in a timely manner.

Grant manager's will refer to TEA's "When to Amend the Application" chart for guidance on when to amend a grant application, dependent on type of grant, based on scenarios in the chart. The chart can be accessed at: [http://tea.texas.gov/Finance\\_and\\_Grants/Administering\\_a\\_Grant.aspx](http://tea.texas.gov/Finance_and_Grants/Administering_a_Grant.aspx).

Examples taken from the chart:

- For a federally-funded formula grant, an amendment is NOT required to:
  - Increase or decrease the amount of funds currently approved in a class/object code on the Program Budget Summary by 25% or less of the total budgeted amount, as long as a new line item is not being added. (Exception: Coordinated Early Intervening Services (CEIS) in the Special Education Consolidated grant application always requires an amendment.)
  - Increase or decrease the amount of funds budgeted for a line item on any supporting budget schedule (i.e., within a class/object code) as long as the description of the line item does not change and as long as the current amount approved in that class/object code is not changed by more than 25% of the total budgeted amount. (Exception: Coordinated Early Intervening Services (CEIS) in the Special Education Consolidated grant application always requires an amendment.)
  - Increase the salary amount of funds budgeted for a line item (i.e., a position type).
  - Increase or decrease the number of positions previously approved by 20% or less, as long as a new position type is not being added.
- For a federally-funded formula grant, an amendment IS required to:
  - Add a class/object code not previously budgeted.
  - Increase or decrease the amount of funds currently approved in a class/object on the Program Budget Summary by more than 25% of the total budgeted amount.
  - Add a new line item on any of the supporting budget schedules.
  - Increase or decrease the number of positions approved by more than 20%.
  - Add a type of position not initially approved.
  - Add a new item or increase the quantity of capital outlay items approved for articles costing \$5,000 or more.
  - Add a new item of capital outlay for articles costing less than \$5,000.

San Angelo ISD's budget amendments are initiated by the program grant manager. Justification for a budget amendment must include the requested dollar amount, description of the cost item, and reason for the amendment.

The Director of Finance confirms that the funds are available, the proposed expenditures are allowable use of funds, and the reason for the amendment qualifies under grant requirements and TEA guidelines.

If approved, the data is entered into the applicable grant application by the grant manager.

The eGrants application amendment is certified and submitted by the grant manager.

Upon receipt of the NOGA, the Director of Finance records the approved amendment in the accounting records either by memorandum entry or by journal entry. The accounting records should provide a complete record of the approved grant budget and all amendments, as well as transactions that do not require an official amendment submission to TEA.

## **902.1 Grant Application Process**

The district may be eligible to apply for “entitlement” or “competitive” federal grant funds. Federal entitlement grant funds include, but are not limited to, No Child Left Behind (NCLB), Individuals with Disabilities Education Act (IDEA), and Carl D. Perkins. The “maximum” and/or “final” entitlement awards for the district are posted on the TEA Grants Management webpage at:

<http://tea.texas.gov/index4.aspx?id=5040>. The appropriate grant manager shall obtain the annual entitlement amounts and begin the grant development process with the appropriate stakeholders.

A list of competitive grants administered by the TEA are also posted on the TEA Grants Management webpage at: <http://tea.texas.gov/index2.aspx?id=2147487872>. The appropriate grant manager shall obtain the competitive grant information to determine whether the grant(s) is appropriate for the district. Some competitive grants may have matching-funds and/or in-kind payment requirements which may place a burden on the district’s available financial resources.

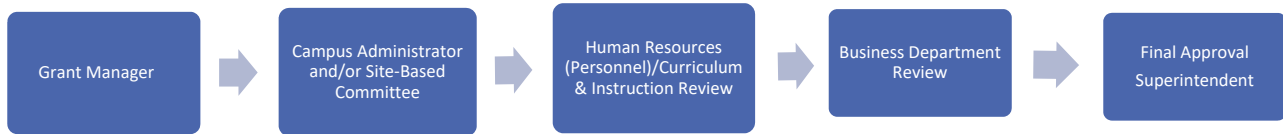
TEA’s Grant Opportunities webpage provides a wealth of information related to available grants such as:

- General and Fiscal Guidelines
- Program Guidelines
- Program-Specific Provisions and Assurances
- General Provisions and Assurances
- Debarment and Suspension Certification
- Lobbying Certification
- Sample Application
- Deadlines and Due Dates for: grant application, amendments and grant reporting

All district staff involved in the management of federal grant awards shall be aware of these resources.

The school district’s grant application process for federal grants is illustrated below on a flowchart. As noted on the flowchart, all grant applications must be reviewed by the business department, human resources department, curriculum department and grants management department. In addition, all grant applications that will support student instruction at one or more campuses, must be developed in collaboration with the respective campus principal(s). Specific grant activities to support the academic program at a campus should be reflected in the Campus Improvement Plan.

The **final approval** of a grant application shall be the Superintendent.



The Executive Director of Schools & SCE, the Director of Federal Programs, and the Director of Bilingual & English Language Learners shall work collaboratively with the business department to ensure that all grant budget schedules are completed using the correct account code structure (as appropriate); the district’s purchasing, travel and other procedures; and are adequately documented if prior approval is required by the granting agency or pass-through entity (TEA).

The Director of Federal Programs and the Director of Bilingual & English Language Learners shall obtain pre-approval for the following activities, which have been identified by the granting agency or pass-through entity (TEA);

- Capital Outlay Purchases
- [Student educational field trips](#) – TEA Division of Grants Administration form
- [Hosting or sponsoring conferences](#) - TEA Division of Grants Administration form
- [Out-of-state travel](#) - TEA Division of Grants Administration form
- [Request for Approval of Special or Unusual Costs](#) – TEA Division of Grants Administration form
- [Request for Approval of Participant Support Costs](#) – TEA Division of Grants Administration form

Although, the federal requirement for Title I, Part A eligibility is 35%, San Angelo Independent School District has increased the percentage to 40% for district campuses to be served as Title I, Part A, “Schoolwide”.

Grants that require matching or in-kind district contributions shall be evaluated for overall impact on the current and future district’s local funds.

No federal grant funds shall be budgeted, encumbered, or spent until either of the following has occurred:

- grant has been approved by the granting agency and a Notice of Grant Award (NOGA) has been issued to the district
- the entitlement grant has been received by the district and the grant application has been submitted to TEA

TEA allows federal grant expenditures from the grant application “stamp-in date”; however, expenditures that require TEA’s specific approval and not approved until the NOGA is issued.

The business department shall notify the grant managers when the funds have been budgeted and are ready for expenditure by the appropriate campus or department.

## 902.2 General Provisions and Assurances

General Provisions and Assurances apply to all grants administered by TEA. Additional provisions and assurances may apply to specific grants. The federal programs department shall inform all staff involved in the expenditure of grant funds of the provisions and assurances for each grant program, as appropriate.

Numerous resources are available on TEA's Provisions and Assurances webpage at:

[http://tea.texas.gov/Finance\\_and\\_Grants/Grants/Administering\\_a\\_Grant/Provisions\\_and\\_Assurances/](http://tea.texas.gov/Finance_and_Grants/Grants/Administering_a_Grant/Provisions_and_Assurances/)

- [General Provisions and Assurances \(The New EDGAR\)](#)
- [Debarment and Suspension \(The New EDGAR\)](#)
- [Lobbying Certification \(The New EDGAR\)](#)

### 902.21 Certification Regarding Debarment, Suspension, Ineligibility, and Voluntary Exclusion

The district must not award a contract to a vendor which is debarred or suspended or is otherwise excluded from or ineligible for participation in federal grant award programs.

The business department and purchasing department shall verify the eligibility of each vendor with this certification requirement by requesting that the vendor execute a Certification Regarding Debarment, Suspension, Ineligibility and Voluntary Exclusion for Covered Contracts form before awarding a contract and/or issuing a purchase order. A copy of the certification form shall be maintained with the contract and/or purchase order for audit purposes.

The business department and purchasing department shall monitor ongoing contracts to verify the contractor's compliance with the debarment, suspension, ineligibility and voluntary exclusion provisions. In the event that a vendor is suspended or debarred during a contract, the district shall continue the contract in force until the contract lapses. The contract term shall not include any extensions to the original term of the contract.

### 902.22 Lobbying Certification

For all federal grants in excess of \$100,000, the district shall certify on the grant application that no federal grant funds are expended for the purpose of lobbying. The federal programs department and business departments shall jointly execute a Lobbying Certification Form [Standard Form – LLL: Disclosure of Lobbying Activities], as applicable, if the district used funds other than federal grant funds for lobbying activities.

The Director of Federal Programs and the Director of Learner Services shall ensure that all contract award documents with federal grant funds contain the appropriate lobbying certification language.



### 902.3 Budgeting Grant Funds

The business department shall budget grant funds in the appropriate fund code as authorized by Financial Accountability System Resource Guide, or the granting agency, as appropriate. In addition, the object expenditure codes noted on the grant application shall be consistent with the budgeted account codes.

Federal grant funds shall be budgeted and available for use no later than one month after receipt of the NOGA or from the stamp-in date.

For example, if the grant application included \$2,000 for “6219 Professional Services”, the budget shall include an appropriation for Professional Services in object code 6219. However, if the intent was to expend funds to pay a Math Consultant, the grant application may need to be amended to move the “6219 Professional Services” funds to the correct object code “6299 Other Professional Services”. All expenditures shall be made from the correct FASRG object code.

Budget amendments, if any, shall be approved by the federal programs department, to ensure that the reclassification of funds is allowable under the grant management guidelines related to budget amendments. Some grants allow a transfer of funds, up to 25% of the grant award, but only within the same object class and if the new object code does not require specific approval from the granting agency.

The TEA Grants Division has developed guidance related to “When to Amend” grants administered by the TEA. The guidance document is posted on the TEA website at: [http://tea.texas.gov/Finance\\_and\\_Grants/Administering\\_a\\_Grant.aspx](http://tea.texas.gov/Finance_and_Grants/Administering_a_Grant.aspx).

The guidance document contains the following guidance:

- Use Table 1 for federally funded grants and for grants funded from both federal and state sources.
- Use Table 2 for state-funded grants. Refer to the “Select Grantees” column if the NOGA is for over \$1 million.

In addition to TEA’s guidelines, federal regulations require that the district amend the grant application when we deviate from the original scope or grant objectives. Other amendments may be necessary when the district changes the designated Grant Manager, disengages from grant activities for more than three (3) months, or a 25% reduction in the time devoted by a grant manager.

The Director of Federal Programs shall monitor the need for amendments at least quarterly throughout the grant period and at least one (1) month prior to the grant amendment deadline, if applicable. If an amendment is necessary for any of the reasons specified by the pass-through entity (TEA) or in federal regulations, the Grant Manager shall initiate the amendment process and collaborate with the business department prior to submission of the grant amendment. The approval process of a grant amendment shall be the same as the grant application process, i.e. the Superintendent shall approve all federal grant amendments.

The business department, Director of Finance, shall be responsible for ensuring that the finance system budget corresponds to the most recent grant NOGA.



## **902.4 Standards for Financial and Program Management**

The district must comply with all requirements of federal grant awards including the provisions of the Federal Funding Accountability and Transparency Act (FFATA) and the Financial Assistance Use of Universal Identifier and Central Contractor Registration (CCR).

### FFATA Reporting

The district shall report the following for all federal grant awards, as appropriate. The Director of Finance shall be responsible for collecting and reporting the information.

1. The following data about sub-awards greater than \$25,000:
  - a. Name of entity receiving award [entity = district]
  - b. Amount of award
  - c. Funding agency
  - d. NAICS code for contracts / CFDA program number for grants
  - e. Program source
  - f. Award title descriptive of the purpose of the funding action
  - g. Location of the entity (including congressional district)
  - h. Place of performance (including congressional district)
  - i. Unique identifier of the entity and its parent
  - j. Total compensation and names of top five executives (same thresholds as for primes)
  
2. The Total Compensation and Names of the top five executives if:
  - a. More than 80% of annual gross revenues from the federal government, and those revenues are greater than \$25M annually
  - b. Compensation information is not already available through reporting to the SEC

### **902.41 Financial Management (2 CFR §200.302)**

The district's financial management system, E Finance Plus, shall be utilized to expend and track all federal grant expenditures. The financial management system shall be maintained in a manner that provides adequate internal controls over the data integrity, security and accuracy of the financial data.

The financial management system must contain information pertaining to all federal awards, authorizations, obligations, unobligated balances, assets, expenditures, income and interest and be supported by source documentation. All expenditures of federal grant funds shall be in accordance with the district's written procedures such as cash management, accounts payable, purchasing, travel, allowable costs, capital asset tracking, contract management, and other procedures, as appropriate.

### Records Retention

The financial management system shall be utilized to store, maintain, and report all required federal grant information. Consequently, the district shall ensure that access to the data is restricted to authorized individuals in accordance with the district's Data Security and Access policies. In addition, the district

shall retain all federal grant records for a period of seven (7) years in accordance with the district's Local Records Retention Plan. The district's department records manager, shall be responsible to ensure that all records are retained, stored and accessible, as appropriate.

#### List of Federal Grant Awards

A list of all federal grant awards shall be maintained to include all EDGAR required data (denoted with an \*) and district-required information listed below: [Exhibit 1]

1. The CFDA title and number\*,
2. Federal award identification number and year\*,
3. Name of the Federal agency\*, and
4. Name of the pass-through entity\*, if any.
5. Grant manager for each grant
6. Subgrants, (if any)
7. TEA-assigned risk level for each grant, as appropriate

On at least a monthly basis, the grant manager, shall review the status of each federal grant fund. The review shall include a comparison of budget to expenditures.

### **902.42 Internal Controls**

The district' internal control procedures over financial management, developed in accordance with the Internal Control Integrated Framework (COSO), shall be made available to all staff involved in the management of federal grant funds. The internal control procedures shall be reviewed on at least an annual basis and updated as appropriate. If any weakness in an internal control is detected, the internal control procedures shall be revised to incorporate the weakness (es) at either the annual review or as the need arises dependent upon the severity (materiality) of the weakness.

A copy of the district's Internal Control Procedures are embedded with this manual and available from the business department. The Comptroller shall be responsible for the annual review and update of the Internal Control Procedures.

### **902.43 Bonds**

If the granting agency requires that the district obtain bonding and/or insurance for a specific project, the district shall ensure that the bonds are obtained from a company that holds a certificate of authority as specific in 31 CFR Part 223, Surety Companies Doing Business with the United States. The Director of Purchasing shall be responsible for obtaining insurance and/or bonding, as appropriate.

### **902.44 Payment (2 CFR §200.305)**

Payments to vendors shall be made promptly in accordance with federal regulations and state law. Specifically, in accordance with the Texas Prompt Payment Act, the district shall pay all invoices within 30 days of receipt of the goods/services and the invoice, whichever is later.

#### *Cash Management*

San Angelo ISD will comply with applicable methods and procedures for payments that minimize the time elapsing between the transfer of funds from the U.S. Treasury or the Texas Education Agency and

the disbursement by San Angelo ISD, whether the payment is made by electronic funds transfer, or issuance or redemption of checks, warrants, or payment by other means. In the event that the district receives an advance payment from a federal granting agency, the district shall ensure that it expends the advanced funds in a timely manner. Excess funds may earn interest, which may require return to the federal granting agency if the interest meets the federal threshold.

San Angelo ISD has determined that it will not accept advanced payments for federal grant funds. The district shall seek reimbursement for federal grant expenditures, rather than using an advanced payment method. Consequently, the district shall prepare and submit a “draw-down” of federal grant funds only after the payments have been made and distributed to the vendor via mail, e-payables or other delivery method. The draw-down of expended funds shall be net of all rebates, refunds, contract settlements, audit recoveries and interest earned, as appropriate. The Cash Manager/Budget Coordinator shall be responsible for preparing the draw-down of federal grant funds. All draw-downs shall be recorded on the general ledger as a receivable when the draw-down process is complete and posted to the cash account upon receipt of the receivable.

#### *Payment Methods*

*Reimbursements:* San Angelo ISD initially charges federal grant expenditures to nonfederal funds and then seeks reimbursement with federal funds.

According to TEA guidance, to be considered a reimbursement, a district draws down from TEA via the ER (Expenditure Reporting) system on or after the date the payment is mailed, delivered, or electronically delivered. All reimbursements are based on actual disbursements, not on obligations. Reimbursements of actual expenditures do not require interest calculations.

*Advances:* To the extent the district receives advance payments of federal grant funds, the district will maintain written procedures that minimize the time elapsing between the transfer of funds and disbursement by the LEA and will ensure its financial management system meets the standards for fund control and accountability as established in EDGAR.

According to TEA guidance, if the LEA draws down federal funds from TEA via the ER (Expenditure Reporting) system prior to making the payment (prior to the time the payment is mailed, delivered, or electronically delivered), the draw down is considered an advance. The payment date is the actual date of disbursement, not the date encumbered or scheduled for payment according to the accounting treatment.

According to 2 CFR §200.305(b)(1), the district will limit its advance payment requests to the minimum amounts needed and will time the advance payment to be in accordance with the actual, immediate cash requirements of the district in carrying out the purpose of the approved program or project. The timing and amount of advance payments must be as close as is administratively feasible to the actual disbursements by the district for direct program or project costs and the proportionate share of any allowable indirect costs. The district must make timely payment to contractors in accordance with the contract provisions.

According to 2 CFR §200.305(b)(7)(i), the federal government and TEA must not require separate depository accounts for funds provided to the district and must not establish any eligibility requirements

for depositories for funds provided to the district. However, the district will have a process in place to account for the receipt, obligation, and expenditure of funds. San Angelo ISD does not choose to maintain a separate depository account for the advance payment of federal funds received from TEA.

### **902.45 Cost sharing or matching funds**

The Grant Manager over each federal grant award shall ensure that requirements for cost sharing and/or matching funds are approved through the grant approval process prior to the submission of the grant. At a minimum, the Superintendent and the Assistant Superintendent of Business Services must approve the commitment of all cost sharing and matching grant funds.

If cost sharing or matching funds are required as part of a federal grant award, the required direct or in-kind expenditures should be recorded and tracked on the general ledger. If matching grant funds are required in the General Fund (Fund 199), the district shall utilize a sub-object to separately track the expenditures for reporting and compliance purposes.

All staff paid with cost sharing and matching funds, shall be subject to the Time and Effort Documentation requirements.

Cost sharing and matching funds that are as a result of donated services or supplies, shall be recorded and tracked in accordance with the federal regulations (CFR 200.306).

### **902.46 Program Income**

San Angelo ISD will not generate any program income as part of a federal grant award. Federal regulations (CFR 200.307) allow the district to generate program income to offset federal grant award costs. Income earned, if any, must be expended in accordance with the grant requirements.

All recommendations for program income activities, shall be reviewed and approved by the Grant Manager, Superintendent, and Assistant Superintendent of Business Services. If program income activities are approved, the Grant Manager over the activities shall ensure that the costs of generating the program income are not federal grant funds, are nominal in cost, are offset from the program income and meet all of the federal requirements. The TEA Division of Grant Administration Request to Add Program Income to Federal or State Grant Award and Expansion Delivery of Programmatic Services Form shall be used to request authorization to use any program income to support a state or federal grant.

**The district will not retain any program income earned through a federal grant program.**

### **902.47 Period of performance (Obligations)**

All allowable grant expenditures shall be incurred during the grant period, i.e. begin date and end date of the federal grant award as designated on the Notice of Grant Award (NOGA). The Grant Manager shall notify the appropriate departments, such as Purchasing, Human Resources, Business, Payroll, etc. of the grant periods for each federal grant award to ensure compliance as noted below:

- No employee shall be hired and paid from federal grant funds except during the federal grant period
- No purchase obligation shall be made from federal grant funds except during the federal grant period

- No payroll or non-payroll expenditures shall be made from federal grant funds except during the federal grant period

All obligations with federal grant funds must occur during the grant period. Obligations that occur before or after the grant period are not allowable costs. The obligations must be liquidated in accordance with the grant deadlines, especially as they relate to the final draw-down of federal grant funds. Guidance regarding the obligation of federal grants funds can be found in TEA’s General and Fiscal Guidelines.

An obligation occurs depending upon the expenditure, as described in the following table.

If the Obligation Is For—	The Obligation Is Made—
Acquisition of real or personal property	On the date the grantee makes a binding written commitment to acquire the property
Personal services by an employee of the grantee	When the services are performed
Personal services by a contractor who is not an employee of the grantee	On the date on which the grantee makes a binding written commitment to obtain services
Performance of work other than personal services	On the date on which the grantee makes a binding written commitment to obtain the work
Public utility services	When the grantee receives the services
Travel	When travel is taken
Rental of real or personal property	When the grantee uses the property

The Grant Manager shall monitor the expenditures during the grant period to ensure that the funds are spent in a systematic and timely manner to accomplish the grant purpose and activities. The following timeline shall be used as a general guide for spending thresholds for a grant period of 15 months. The optimal spending thresholds noted below may be adjusted based on programmatic needs. For example, if the federal grant will be used for summer activities such as summer school, a larger percentage of the grant may need to be withheld for those specific activities.

- Within 3 months of the grant start date                      25%
- Within 6 months of the grant start date                      50%
- Within 9 months of the grant start date                      75%
- Within 12 months of the grant start date                      100%

## **902.5 Procurement Standards/Expenditure of Grant Funds**

Expenditures of grant funds shall be through the purchasing, business or payroll department processes in place for non-grant funds, but shall have additional requirements as noted below to ensure full compliance with federal cost principles.

### **902.51 General Procurement Standards (2 CFR §200.318)**

San Angelo ISD shall comply with the general procurement requirement of the EDGAR (2 CFR 200), in its entirety, by 2020-2021. The district shall utilize a purchase order and encumbrance system to manage the expenditure of all federal grant funds unless other methods such as credit cards, petty cash, direct

payments, etc. are authorized in the district's operating procedures. All purchases shall be in accordance with the district's School Board Policies (CH Legal and Local) and the district's [Purchasing Procedures](#). The district purchasing procedures shall comply with all federal, state and local procurement requirements.

The Director of Purchasing shall be responsible for ensuring compliance with all federal, state and local procurement requirements and for ensuring that the district maintains an up-to-date procurement history to include, but not limited to, the information below:

- List of all procurements by type
- Advertisement date(s) of the procurement
- Release date of the procurement specifications
- Selection criteria for vendors
- Opening date of the procurement
- List of vendors submitting a proposal/bid
- Selection of Vendor
- Date of contract award
- Begin date of contract
- End date of contract

The procurement history records and other procurement records shall be retained in accordance with the federal, state and/or local retention periods, whichever is greater. The procurement records shall be made available to the federal granting agency, pass-through entity (TEA), and auditors, as appropriate.

#### Purchasing Efficiency Strategies

All purchases with federal grant purchases shall be in accordance with the federal regulations, specifically CFR §200.318. All purchases shall be purchased from a variety of qualified vendors with the ability to perform successfully under the terms and conditions of a proposed procurement. The district shall strive to avoid acquisition of unnecessary or duplicative items. The district shall implement the following strategies to maximize federal grant funds:

- Consolidation of purchases to obtain volume pricing, as appropriate
- Evaluate the cost efficiencies of leases versus purchases of equipment
- Utilize cooperative purchasing agreements, as appropriate, to obtain volume pricing
- Utilize federal or state excess/surplus property supplies or equipment in lieu of purchasing new supplies or equipment, as appropriate
- Utilizing value-engineering in construction projects to seek cost reductions
- Develop vendor selection criteria to select the best vendor
- Develop a tracking system of all informal and formal procurements
- Avoid "time and materials" contracts if other alternatives exist
- Monitor vendor performance to ensure that the vendor to ensure that the vendor provides the services and/or goods, as appropriate
- Ensure that all contract and vendor disputes are resolved in the most advantageous manner

- Minimize the risk of jurisdictional issues by ensuring that all contracts would be litigated in a court within the county, city and/or state, as appropriate

The district shall request that the pass-through entity (TEA) review and make a determination regarding the district's procurement system on at least an annual basis. The results of the certification shall be distributed to all grant management staff. If deficiencies are noted, the Director of purchasing shall develop a Corrective Action Plan to remedy the deficiencies, as appropriate.

#### Conflict of Interest (2 CFR 200.112)

The Superintendent shall execute an Organizational Conflict of Interest document to disclose if any conflicts exist in the application, receipt of, or expenditure of federal grant funds.

The Grant Manager, Director of Finance, and Comptroller shall each execute a Conflict of Interest Form to disclose a conflict of interest, as appropriate, related to the awarding of a contract or substantial expenditures with federal grant funds. Substantial expenditures shall be defined as a purchase in excess of \$25,000. **No employee, officer, or agent may participate in the selection, award, or administration of a contract supported by a Federal award if he or she has a real or apparent conflict of interest. In addition, no employee, officer or agent of the district may neither solicit nor accept gratuities, favors or anything of monetary value from contractors or parties to subcontractors. All employees shall comply with the Educators' Code of Ethics (DH Exhibit). Violators of the Code of Ethics shall be subject to disciplinary action, including but not limited to, termination of employment with the district.**

In accordance with 2 CFR §200.318(c)(1), the LEA maintains the following standards of conduct covering conflicts of interest and governing the actions of its employees engaged in the selection, award and administration of contracts.

No employee, officer, or agent may participate in the selection, award, or administration of a contract supported by a federal award if he or she has a real or apparent conflict of interest. Such a conflict of interest would arise when the employee, officer, or agent, any member of his or her immediate family, his or her partner, or an organization which employs or is about to employ any of the parties indicated herein, has a financial or other interest in or a tangible personal benefit from a firm considered for a contract.

#### *Mandatory Disclosure to the District*

The employee shall disclose in writing to his or her immediate supervisor a personal financial interest, a business interest, or any other obligation or relationship that in any way creates a real or potential conflict of interest with the proper discharge of assigned duties and responsibilities or that creates a potential conflict of interest with the best interest of the district. In the case that the individual receiving the report is also involved in the potential conflict, the disclosure should be submitted to the Assistant Superintendent of Business and Support Services.

The officer or agent of the district shall disclose in writing to the Assistant Superintendent of Business and Support Services a personal financial interest, a business interest, or any other



obligation or relationship that in any way creates a real or potential conflict of interest with the proper discharge of assigned duties and responsibilities or that creates a potential conflict of interest with the best interest of the district. In the case that the individual receiving the report is also involved in the potential conflict, the disclosure should be submitted to the Assistant Superintendent of Educational Support Services.

*Mandatory Disclosure 2 CFR §200.113*

San Angelo ISD must, in a timely manner, in writing to the federal awarding agency or pass-through entity (TEA) report, all violations of federal criminal law involving fraud, bribery, or gratuity violations potentially affecting the federal award.

Upon discovery of any potential conflict of interest and all violations of federal criminal law involving fraud, bribery, or gratuity violations, the LEA will disclose in writing the potential conflict or violation of federal criminal law to the federal awarding agency in accordance with applicable federal awarding agency policy.

## **902.52 Vendor Competition**

The business/purchasing department shall be responsible for selecting and awarding contracts to vendors that are qualified to provide the goods and/or services to be purchased with federal grant funds. The vendor selection process shall ensure that the district does not restrict competition among qualified vendors.

### Vendor Selection Criteria

The district has selected vendor qualification criteria that includes, but is not limited to, the following:

- Past experience with the district
- Cost of goods and services, including future costs of maintenance
- Vendor's financial stability and position as it relates to the ability to provide the goods and/or services

The district shall not restrict vendor competition by requiring any of the following as selection criteria:

- Unreasonable requirements, such as excessive experience or bonding, brand name products or geographic preferences that would unduly restrict competition among qualified vendors
- Arbitrary restrictions that are not essential to the bid/proposal specifications

A vendor database shall be maintained by the purchasing department, Director of Purchasing. The district's **Vendors Procedures** shall be adhered to for all purchases. Vendor selection shall include the following criteria:

- Has not been debarred or suspended from contracting under federal grants

All vendors shall complete the appropriate vendor forms as required by federal or state regulations and the district. The district requires that every vendor have the following documents on file:



- Vendor application file (new vendors)
- Form W-9
- Conflict of Interest Questionnaire
- Felony Conviction Notice
- Fingerprinting (If working directly with students)

The district shall develop written bid/proposal specifications that are provided to every qualified vendor to ensure consistency in the procurement process. At no time shall the district allow a specific vendor to develop the bid/proposal specifications as this may provide a barrier to open, competition among the qualified vendors. The bid/proposal documents must include guidance to vendors regarding the following:

- Time, date and place of bid/proposal opening
- Anticipated award date, as applicable
- Written specifications and addendums, as appropriate
- List of all bid/proposal required documents such as CIQ, Felony Conviction Notice, etc.
- Bid/Proposal Sheet
- Bid/Proposal evaluation criteria, including the weights, as applicable

The Director of Purchasing shall oversee all bid/proposal documents before release to the vendor to ensure the documents comply with the federal requirements.

### **902.53 Procurement Methods (2 CFR §200.320)**

The district shall use one of the procurement methods allowed by federal regulations to procure goods and services with federal grant funds. In addition, the district shall comply with state purchasing laws and local Board Policy, [CH Legal](#) and [CH Local](#).

The procurement method shall be determined based on the type of goods or services to be purchased with federal grant funds. The grant manager shall be responsible for selecting the appropriate procurement method for each procurement.

**The district shall adhere to the most restrictive federal regulations, state laws, local policies and/or procedures when the guidance documents are in conflict.**

#### Small Purchase Procedures

The **Procurement by Small Purchase Procedures** shall be used by the district when the purchase of goods or services **do not exceed \$25,000**, the Simplified Acquisition Threshold (CFR 200.88). The purchasing department shall require written, emailed or faxed quotations from at least three (3) qualified vendors for all small purchases, i.e. purchases that do not exceed \$50,000 [the state law threshold which requires a competitive procurement].

A small purchase threshold for non-federally funded purchases shall be \$20,000 and the small purchase threshold for federally-funded purchases shall be \$3,000.

The purchasing department shall require written, emailed or faxed quotations from at least three (3) qualified vendors for all small purchases, i.e. purchases that do not exceed \$5000. The district shall strive

to obtain small purchases from qualified vendors under a Cooperative Purchasing Program. The district is currently participating in the following cooperative purchasing programs:

- TASB Buy Board
- TCPN
- ESC 15

Purchases under \$50,000 (State rule: FASRG Purchasing Module, pg. 2; for School Districts)

To obtain the most competitive price, a district at its option *may obtain price quotes* for items costing *less than 25,000*. The district's purchasing procedures should clearly define the lower figure for which quotes are required and *obtain and retain* written verification of the prices quoted. Unlike the mandatory competitive procurement described for purchases over \$50,000, if an item costs less than \$50,000, a district may utilize price quotations to stimulate competition and to attempt to receive the most favorable pricing.

Sealed Bid Procedures

The **Procurement by Sealed Bids** method shall be used by the district when the purchase of goods or services exceed \$25,000 if the acquisition of the goods or services lends itself to a fixed price contract and the selection of the successful bidder can be made principally on the basis of price. The district shall comply with the sealed bid requirements, as defined by the EDGAR, as noted below:

- Bids must be solicited from an adequate number of bidders, but no less than two (2) bidders.
- Bids must be publicly advertised and bidders shall be provided an adequate amount of time to prepare and submit their bid.
  - The district shall publicly advertise all bids in accordance with state law, i.e. at least two (2) times in two separate weeks.
  - The district shall provide no less than ten (10) days for bidders to prepare and submit their bids.
- Bids must contain detailed specifications to ensure that bidders have a clear understanding of the goods or services that the district is seeking to purchase.
- Bids must specify the time, date and district location where bids will be opened publicly.
- Bids must be awarded based on a fixed price contract to the lowest responsive and responsible bidder. The district shall consider discounts, transportation costs and life cycle costs only if these factors were included in the bid specifications. The district will consider payment discounts because the district does routinely take advantage of payment discounts.
- Bids will be evaluated, ranked and a recommendation for award made to the School Board at a regularly scheduled board meeting.
  - If no bidder is recommended, the district shall reject all bids and evaluate whether to modify the bid specifications to initiate a new bid process.
- The district shall notify the successful bidder and process the contract documents and/or purchase orders, as appropriate.
- The district shall notify all of the unsuccessful bidders to ensure that qualified bidders are encouraged to submit bids during future bid opportunities.

### Competitive Proposal Procedures

The **Procurement by Competitive Proposal** method shall be used by the district when the acquisition of the goods or services exceeds \$25,000 and does not lend itself to a fixed price contract. The district shall comply with the sealed bid requirements, as defined by the EDGAR, as noted below:

- Requests for Proposals (RPF) must be publicly advertised.
- The RFP shall identify the evaluation factors and their weight in awarding the proposal.
- Proposals shall be solicited from an adequate number of bidders, but no less than two (2) qualified vendors.
- Proposals shall be evaluated, ranked and a recommendation for award made to the School Board at a regularly scheduled board meeting.
  - The district shall develop an instrument to evaluate each proposal and rank the proposals based on the evaluation scores.
  - The district shall evaluate each proposal by committee or no less than two (2) district staff with knowledge of the RFP specifications.
  - In accordance with state law, the vendor who is ranked highest as providing the “proposal most advantageous to the district” shall be notified of the potential award.
    - The district may negotiate with the vendor only as it relates to potential cost savings.
    - If the district and vendor ceases to negotiate, the district shall notify the vendor in writing before starting to negotiate with the 2<sup>nd</sup> highest ranked vendor.

### Noncompetitive Proposal Procedures

The **Procurement by Noncompetitive Proposal** method shall be used by the district when the purchase of goods or services is from a “sole source vendor”. A sole source vendor is defined as a vendor that meets the following requirements:

- The goods or services are only available from a single source.
  - The district shall acquire and maintain a copy of a vendor’s sole source letter which specifies the statutory or other reason for its sole source status.
  - The TEA Division of Grants Administration Request for Noncompetitive Procurement (Sole Source) Approval Form shall be utilized to request prior approval of a non-competitive, sole source proposal.
- A public exigency or emergency will not permit a delay resulting from the competitive solicitation process.
  - The district shall declare a public exigency or emergency prior to making such as purchase of goods or services under this method.
- The granting agency or pass-through entity authorized the use of a non-competitive proposal method.
  - The district shall obtain written approval/authorization from the granting agency or pass-through entity.
- After solicitation of a number of sources, competition is determined to be inadequate

- The district shall determine that competition is inadequate if after two (2) solicitations of bids and/or proposal, only one vendor is responsive to the solicitations.

#### Other Procurement Guidelines

Regardless of the procurement method, the district shall encourage small, minority, woman-owned and labor surplus area firms to compete with other qualified vendors by implementing strategies to encourage their participation.

The district shall comply with the federal regulations related to the procurement of recovered materials (CFR 200.322) and the Solid Waste Disposal Act.

For all purchases that exceed the Simplified Acquisition Threshold of \$150,000, the district shall perform a cost or price analysis with every procurement. Secondly, all purchases that exceed this threshold shall comply with federal bonding requirements such as:

- Bid guarantee from each bidder of five percent (5%) of the contract price
- Performance bond on the part of the contractor for 100% of the contract price
- Payment bond on the part of the contractor for 100% of the contract price

The Director of Purchasing shall be responsible to ensure that all purchases above this threshold are guaranteed with the appropriate bid guarantee, performance bond and payment bond.

All contracts for services and/or goods purchased with federal grant funds shall be subjected to the same review and approval process as all other district contracts. The Contract Procedures and Checklist are applicable to all federally funded contracts.

The district shall retain all records related to the procurement of goods and services in accordance with federal, state and local requirements. In addition, all procurement records shall be available for inspection and/or audit during the life of the records. The district shall maintain all procurement records for seven (7) years in accordance with the district's Local Records Retention Schedule.

### **902.6 Property Standards**

The district shall safeguard all property (assets and inventory) purchased with federal grant funds under the same guidelines as property purchased with local funds. Additional insurance for property purchased with federal grant funds shall be acquired if specifically required by a federal grant award. The Assistant Superintendent of Business Services shall oversee the acquisition of insurance for all federally funded property.

#### Real Property

San Angelo ISD has not and will not use federal grant funds to purchase real property.

#### Capital Assets, Equipment, and Supplies

San Angelo ISD shall use federal grant funds to purchase equipment and supplies. The district shall not use federal grant funds to purchase intangible property. The federally-funded equipment shall be used only for the authorized purposes and shall be disposed of, at the end of the useful life or end of the grant

period, in accordance with the grant award guidelines. The district shall not use the federally-funded equipment to generate program income. The federally-funded supplies shall be used only for the authorized purposes. Any residual (unused) supplies, in excess of \$5,000 in total aggregate value, at the end of the grant program or project may be used for any other federal grant program. Otherwise, the supplies shall be retained by the district or sold, but must reimburse the granting agency for the district use or sell of the supplies. The district shall implement purchasing deadlines for the purchase of federally-funded supplies to ensure that residual supplies are not available at the end of the grant period or project. The purchasing deadlines are posted on the SAISD webpage at [www.saisd.org](http://www.saisd.org).

### Capitalization Policy and Definitions

The district shall utilize the same capitalization policy for non-grant and grant-funded asset purchases. The district's capitalization threshold for assets is \$5000 per unit cost. The district has adopted the EDGAR (CFR 200.12) definitions of property as noted below:

- *Capital assets* means tangible or intangible assets used in operations having a useful life of more than one year which are capitalized in accordance with GAAP. (CFR 200.12).
- *Equipment* means tangible personal property (including information technology systems) having a useful life of more than one year and a per-unit acquisition cost which equals or exceeds the lesser of the capitalization level established by the non-Federal entity for financial statement purposes, or \$5,000. (CFR 200.33).
- *Computing devices* means machines used to acquire, store, analyze, process, and publish data and other information electronically, including accessories (or "peripherals") for printing, transmitting and receiving, or storing electronic information. (CFR 200.20).
- *General purpose equipment* means equipment which is not limited to research, medical, scientific or other technical activities.
  - Examples include office equipment and furnishings, modular offices, telephone networks, information technology equipment and systems, air conditioning equipment, reproduction and printing equipment, and motor vehicles.
- *Information technology systems* means computing devices, ancillary equipment, software, firmware, and similar procedures, services (including support services), and related resources. (CFR 200.58).
- *Special purpose equipment* means equipment which is used only for research, medical, scientific, or other technical activities.
  - Examples of special purpose equipment include microscopes, x-ray machines, surgical instruments, and spectrometers.
- *Supplies* means all tangible personal property other than those described in §200.33 Equipment. A computing device is a supply if the acquisition cost is less than the lesser of the capitalization level established by the non-Federal entity for financial statement purposes or \$5,000, regardless of the length of its useful life. (CFR 200.94).

### Acquisition Cost

The district has also adopted the EDGAR definition of Acquisition cost as noted below:

- *Acquisition cost* means the cost of the asset including the cost to ready the asset for its intended use. Acquisition cost for equipment, for example, means the net invoice price of the equipment, including the cost of any modifications, attachments, accessories, or auxiliary apparatus necessary to make it usable for the purpose for which it is acquired. Acquisition costs for software includes those development costs capitalized in accordance with generally accepted accounting principles (GAAP). Ancillary charges, such as taxes, duty, protective in transit insurance, freight, and installation may be included in or excluded from the acquisition cost in accordance with the non-Federal entity's regular accounting practices.(CFR 200.2).

The district shall utilize the invoice cost, an all related costs, to record the cost of the equipment on the fixed asset database.

The district has also defined “inventory items” as items with a unit cost over \$5,000. These items shall have a tag affixed to the item for inventory tracking and insurance purposes only. Inventory items shall include computing devices within these costs. The district shall track these items for insurance purposes and shall conduct an annual inventory of these items to the extent possible.

The district has also defined technology-related “walkable” or “personal use” items with a unit cost less than \$1,000 as the following (these items shall be tracked by the Technology Department).

- I-Pads
- Kindle/Nook
- Tablets
- Chromebooks
- Computers with a cost under \$1,000

## **902.61 Identifying and Tracking Federally-Funded Assets**

Federally funded equipment and supply purchases shall be retained by the district, unless otherwise notified by the granting agency. As district property, the district shall affix a tag, inventory, and dispose of all assets (non-grant and grant-funded) according to the district’s fixed asset procedures. The district procedures shall include the recording of all assets on a database with the following information:

- 1) District-issued tag (or identification number)
- 2) Date of acquisition
- 3) Description of asset
- 4) Serial number, or other identifying number
- 5) Funding source, i.e. fund code
- 6) Federal use of asset (percentage)
- 7) Cost of asset (acquisition cost)
- 8) Use and condition of the asset (New, Used, etc.)
- 9) Life of asset
- 10) Location of asset (building and room number)
- 11) Depreciation of asset
- 12) Owner of asset title, typically the district

### Maintaining Asset Inventory & Records

All federally-funded assets shall be maintained in an operable state. If repairs are necessary, the district may pay for the repairs of the federally-funded assets with federal grant funds, unless expressly restricted by the granting agency.

The district fixed asset procedures shall include an annual inventory (or more frequently if required by a granting agency) of all assets and reconciliation of the inventory reports. The district's annual inventory of assets shall be conducted by the grant managers for each program area. Lost, damaged, or stolen assets shall be recorded on the fixed assets database with the date of the loss. The disposition records such as the loss report (police report for thefts) shall be maintained with the asset records.

In addition, the district and grant managers shall track all grant-funded asset purchases by grant, or fund code, as appropriate. The disposal of grant-funded assets shall be in accordance with federal guidelines and grant-specific guidelines, if any. At a minimum, the disposition date, reason and sale price of all federally-funded assets shall be recorded in the fixed assets database.

During the life of the asset, the district shall ensure that all assets purchased with federal grant funds are insured against loss. The costs to insure and maintain (repair) assets purchased with federal grant funds are generally allowable costs, unless specifically prohibited by a granting agency.

The Inventory Specialist shall be responsible for maintaining the fixed asset database of all district assets, including all federally-funded assets.

## **902.7 Cost Principles**

All grant expenditures must be allowable under the Federal Cost Principles (2 CFR 200 – Subpart E), the grant application program assurances, the granting agency's policies, and the district policies and procedures.

The district shall adhere to the [General Provisions for Selected Items of Cost \(Cost Principles\)](#) for federal grants and any additional grant-specific cost principles. The general principles of EDGAR state that:

- Costs must be reasonable and necessary.
  - A cost is reasonable if, in its nature and amount, it does not exceed that which would be incurred by a prudent person under the circumstances prevailing at the time the decision was made to incur the cost.
  - Necessary is defined as costs needed to carry out the grant activities.
- Be allocable to Federal awards.
- Be authorized or not prohibited under State or local laws or regulations.
- Conform to any limitations or exclusions set forth in these principles, Federal laws, terms and conditions of the Federal award, or other governing regulations as to types or amounts of cost items.
- Be consistent with policies, regulations, and procedures that apply uniformly to both Federal awards and other activities of the governmental unit.
- Be accorded consistent treatment. A cost may not be assigned to a Federal award as a direct cost if any other cost incurred for the same purpose in like circumstances has been allocated to the Federal award as an indirect cost.
- Except as otherwise provided for in EDGAR, be determined in accordance with generally accepted accounting principles.



- Not be included as a cost or used to meet cost sharing or matching requirements of any other Federal award in either the current or a prior period, except as specifically provided by Federal law or regulation.
- Be the net of all applicable credits.
- Be adequately documented.

The district shall utilize the Allowability/Allocability of Costs Worksheet to verify that all proposed obligations and expenditures meet the Cost Principles. If the Worksheet reflects that the proposed obligation and/or expenditure is not allowable and/or allocable to a federal grant award, the district shall not make the obligation/purchase with the federal grant funds. Other funds, such as local funds, may be used to make the obligation/expenditure, as appropriate.

The **total cost** of a federal award is the sum of allowable direct and allocable indirect costs less any applicable credits. All refunds, rebates, discounts or other credits to grant expenditures shall be posted to the finance general ledger as soon as the credit is known. The district shall ensure that all known credits have been posted to the general ledger prior to the drawdown on federal grant reimbursements. The Director of Finance shall ensure that all applicable credits have been posted to the general ledger prior to preparing and submitting a federal grant draw-down request from the granting or pass-through entity.

A cost allocation plan or an indirect (F&A) cost rate, whether submitted to a Federal cognizant agency for indirect costs or maintained on file by the district, must be certified by the district using the Certificate of Indirect Costs as set forth in Appendices III through VII, and Appendix IX. The certificate must be signed on behalf of the district by the Superintendent.

All district costs with federal grant funds, whether direct or indirect, shall meet the minimum requirements of allowability as specified in the 2 CFR 200.403. In addition, the costs must meet the general provisions for selected items of cost (2 CFR 200.420). Specific items not listed within these procedures shall be evaluated by the Grant Manager and Business Department on case-by-case basis for allowability. The general cost allowability rules for specific items of cost listed within these procedures shall apply to all federal grant funds, unless more restrictive allowability rules are required by a particular federal grant award. **The district shall adhere to the more restrictive allowability rules when a conflict arises between the general allowability rules, the program-specific allowability rules and the district’s allowability rules.**

#### Selected Items of Costs

District costs generally fall under two major categories:

- 1) compensation/benefits; and
- 2) non-compensation (supplies, services, travel or equipment).

The district has elected to use federal grant funds for both compensation/benefits and non-compensation expenditures.

### **902.71 Compensation & Benefits – Employee (Payroll Expenditures) (2 CFR §200.431)**

Compensation and benefits (payroll expenditures) are allowable costs for personal services rendered by district employees during the period of performance under the federal grants.



### Compensation Costs

All payroll expenditures shall be paid in accordance with the federal cost principles. First and foremost, the payroll expenditures must be authorized on the grant application and the duties assigned must be directly related to grant activities. In addition, compensation costs shall be allowable if:

- The costs are reasonable for the services rendered and conforms to the established district compensation and benefit plans for expenditures with all other funds, i.e. local funds.
- The employees have been employed in accordance with the district's established Hiring Procedures.
- The costs are supported by the appropriate timekeeping, absence tracking, time & effort certifications or other documentation, as appropriate.
- Federally-funded employees shall report all outside employment or professional services rendered to other entities. The external employment and/or professional services shall not conflict with the federally-funded activities with the district.
- Incentive compensation, such as stipends, awards, early resignation incentive, attendance incentive, etc. in accordance with the district's written plans for each of these incentives.
- Stipend compensation for other non-federal grant award duties shall be supported by a Supplemental Duties Job Description/Pay Notice. The additional duties shall not conflict with the federally-funded activities with the district.

### Benefit Costs

District costs for fringe benefits for federally-funded staff shall be allowable as noted below:

- All benefit costs shall be in accordance with the district's written Summary of Employee Benefits.
- All leave benefits shall be in accordance with the district's written Leaves and Absences Policy (DEC Local).
- The benefit costs shall be distributed equitably at the same allocation rate (percentage) as the base compensation.
- The benefit costs were earned and paid during the grant period.
- All benefit costs shall be allowable under the Internal Revenue Service, Fringe Benefits Guide (as subjected to taxes, as required by federal statute).

The district shall not charge any benefit costs to a federally-funded grant if the benefit costs are not in accordance with district's written Summary of Employee Benefits, School Board Policy, or other written benefit plan(s). The district has established the following as **non-allowable** benefit costs:

- Severance or settlement agreement payouts to current and/or previous federally-funded grant staff.
- Optional pension plans (other than the mandatory Teacher Retirement System of Texas contributions).
- Automobile costs or allowance.

### Documentation of Compensation and Benefit Costs

In addition, to the time and effort reporting requirements, the district shall support all compensation and benefit costs paid with federal grant funds shall be supported by the following documentation:

- Exempt staff
  - Employment agreement, contract, or reasonable assurance, as appropriate
  - Job description signed by the employee with language similar to: *Funded by Title I, Part A with the primary purpose of supporting grant activities aimed at improving academic achievement for students struggling to meet state standards.*
  - *Supplemental duties, if any, shall be supported by a Supplemental Duties Job Description/Pay Notice*
  - Absence records, if any
  - Time and Effort documentation, as appropriate (Semi-Annual Certification, Periodic Time and Effort, or the Substitute System for Time and Effort)
- Non-Exempt staff
  - Employment agreement, contract, or reasonable assurance, as appropriate
  - Job description signed by the employee with language similar to: *Funded by Title I, Part A with the primary purpose of supporting grant activities aimed at improving academic achievement for students struggling to meet state standards.*
  - Absence records, if any
  - Time and Effort documentation, as appropriate (Semi-Annual Certification, Periodic Time and Effort, or the Substitute System for Time and Effort)
  - Timekeeping records (actual work hours per workweek) in accordance with the FLSA and the district's Timekeeping Procedures

#### Relocation costs of employees

Relocation costs are costs incident to the permanent change of duty assignment (for an indefinite period or for a stated period of not less than 12 months) of an existing employee or upon recruitment of a new employee. Relocation costs are allowable, subject to the limitations specified in policy §200.464. San Angelo ISD does not spend Federal or State supplemental funds on relocation costs. The district will follow the processes and procedures set forth in the Employee Handbook and Human Resources procedures.

#### **902.72 Selection of Grant-Funded Staff**

The Grants Manager shall work collaboratively with the appropriate stakeholders (campuses and departments) to identify all staff needed to accomplish the grant activities. The Grant Manager shall work collaboratively with the Business Department to obtain estimated salaries for proposed grant-funded staff prior to the completion of the grant application. And, the Grant Manager shall provide a copy of the Payroll Summary of each grant program to each of the campuses and departments noted above upon approval of the grant application.

The process of approving payroll expenditures from grant funds shall be a collaborative process between the campus or department, Human Resources, Grants Management, and Business [Purchasing, Budgeting, Accounting and Payroll] departments. Each campus and/or department plays an essential role in ensuring that all federal grant requirements are met.

The School Board approved Compensation Pay Scale shall be used to compensate all district staff whether paid from local, state or federal grant funds. In addition, the district shall provide the same employer-provided benefits for all district staff whether paid from local, state or federal grant funds.

The compensation for grant-funded staff shall be allocated to the respective grant program (fund) based on the single and/or multiple cost objectives performed by the grant-funded staff. If a grant-funded staff member performs non-grant activities during the day or beyond the normal work day, the compensation for the non-grant activities shall be paid from non-grant funds. Grant-funded staff with more than one cost objective, shall comply with the Time and Effort documentation requirements. Incentive payments, such as performance, perfect attendance, safety, etc. for grant-funded staff shall be allowable with federal grant funds if they are based on the same criteria as non-federal grant funded staff.

### New Positions

New grant-funded positions shall be created only when a job description has been developed and the position has been approved by the Superintendent, Human Resources Department and the Grant Manager. The Grant Manager shall ensure that the position is approved on the grant application and that adequate funds exist to fill the position. The business and payroll departments shall be notified to ensure that the position is budgeted on the general ledger and the position is paid using the correct payroll account distribution codes.

### New Hires

New staff hired for work in positions that are wholly or partially funded with federal grant funds, shall be hired when a position and funding are both available. Upon separation of an employee, the home campus or department of the position shall initiate a request to replace the position. A Personnel Action Request must be used to start the process.

The Grants Manager shall review the request to ensure that the position is still authorized and necessary. Changes to the job description, if any, shall be made at this time. The business department, Cash Manager/Budget Coordinator shall review the request to ensure that adequate funds exist in the appropriate account code(s). If funds do not exist, the Business Department shall notify the Grants Manager to determine if funds will be re-appropriated to the account code(s). After approval from the Grants Manager and Director of Finance, the Human Resources department shall advertise the position.

The screening and selection process shall include a review of the recommended applicant to ensure that he/she meets the highly qualified requirements under the Every Student Succeeds Act (ESSA), as appropriate, or any other grant-specific credentials.

Upon employment, the new hire shall receive and sign a copy of his/her respective job description to include the grant funding source. If the position is funded with a short-term grant fund, the employee shall be notified in writing when the grant funding will lapse, especially if their position will lapse at the end of the grant.

### Transfer of Personnel

When staff in a position funded with grant funds is recommended for transfer to another campus, department, or assignment, the grants management, human resources, and business departments shall work collaboratively to ensure that the appropriate staff allocations and funding changes are made at the time of the transfer. The home campus or department shall initiate the request for the transfer, especially if it is a teaching assignment change at a campus. The grants management, human resources and business departments must evaluate the requested transfer to ensure that the staff allocations, highly qualified staff requirements, and funding source changes are in compliance with grant requirement.

For example, if an elementary principal requests to transfer a Title I 4<sup>th</sup> grade teacher to a 1<sup>st</sup> grade regular classroom teacher, the following considerations should be evaluated by the respective departments: 1) HR – ensure that a vacancy exists in a 1<sup>st</sup> grade teacher position and that the teacher recommended for transfer is certified to teach 1<sup>st</sup> grade; 2) Grants management – ensure that the grant strategies and activities can be accomplished in a timely manner after filling the vacancy that would be created by the transfer; and 3) Business department – ensure that funds exists for the additional 1<sup>st</sup> grade teacher slot and change the payroll account distribution code(s) from Title I to General funds as of the effective date of the transfer.

### Substitute Teachers

Salary expenditures for substitute teacher are allowable for approved teacher positions. The business, grants and payroll departments shall ensure that the expenditures for substitute teacher costs are budgeted and expensed from the appropriate account code(s). The School-Board approved substitute pay scale shall be used to compensation all substitute teachers whether paid from local, state or federal grant funds.

### Stipends and Extra Duty Pay

Stipend and extra duty pay expenditures are allowable for authorized and approved activities. A schedule or work log shall be maintained to substantiate the stipend and/or extra duty pay. The School-Board approved Stipend and Extra Duty Pay Schedule shall be used to compensate all extra-duty pay assignments and substitute teachers whether paid from local, state or federal grant funds.

The business department shall ensure that the expenditures for stipend and extra duty pay are budgeted and expensed from the appropriate account code(s). The stipend and extra duty pay rates shall be the same as the rates used for similar locally funded activities. For example, if a teacher stipend for attending a 1-day professional development activity funded through local funds during a non-scheduled work day is \$150 per day, the teacher stipend for attending a federally-funded 1-day professional development activity should be \$150 per day, too.

## **902.73 Time and Effort Documentation (2 CFR §200.430)**

District staff funded wholly or partially with federal grant funds shall comply with federal guidelines related to time and effort. All employees who are paid in full or in part with federal funds must keep specific documents to demonstrate the amount of time they spent on grant activities. This includes an employee whose salary is paid with state or local funds but is used to meet a required “match” in a federal program. The grant funded staff, their immediate supervisors, grants management, human resources, and business departments shall be aware of the federal guidelines related to time and effort documentation. On

a least an annual basis, all impacted staff shall be trained by the grants management department and/or attend appropriate training from an outside source. The district shall collect and monitor time and effort documentation for district employees only. **Time and effort documentation does not apply to Independent Contractors.**

The district shall comply with all federal time and effort documentation guidelines.

Charges to federal awards for salaries and wages must be based on records that accurately reflect the work performed. These records must:

- Be supported by a system of internal controls which provides reasonable assurance that the charges are accurate, allowable, and properly allocated;
- Be incorporated into official records;
- Reasonably reflect total activity for which the employee is compensated, not exceeding 100% of compensated activities;
- Encompass both federally assisted and all other activities compensated by the LEA on an integrated basis;
- Comply with the established accounting policies and practices of the LEA and
- Support the distribution of the employee's salary or wages among specific activities or costs objectives.

All personnel paid with Federal funds are subject to Time Distribution Reporting to ensure that Federal program funds are used to pay only their proportionate share of personnel costs. The reporting must demonstrate that an employee paid with Federal funds actually worked on that specific Federal program or cost objective.

The type of time distribution report required is dependent on whether the employee works on a single cost objective or multiple cost objectives. San Angelo ISD elects to use the Substitute System of Time and Effort Reporting authorized by TEA.

A cost objective is a function, organizational subdivision, contract, grant, or other activity for which cost data are needed and for which costs are incurred. For example, a single cost objective can be a single function or a single grant or a single activity.

Salaries and wages of employees used in meeting cost sharing or matching requirements of Federal awards are also subject to the Time Distribution Reporting requirement. Contractors are not subject to the Time Distribution Reporting requirement.

*Single Cost Objective (Periodic/Semi-Annual Certification)*

Applies to employees who work solely (100% of their time) on a single Federal award/grant program or cost objective.

Charges for their salaries and wages must be supported by Periodic (Semi-Annual) Certifications that certify the employee worked solely on that program/single cost objective for the period covered by the certification.

The Periodic (Semi-Annual) Certification must be prepared at least semi-annually and signed after-the-fact. The Periodic (Semi-Annual) Certification must be signed by the employee or by the supervisor having first-hand knowledge of the work performed by the employee. The Periodic (Semi-Annual) Certifications are submitted to the Title I Department. The Periodic (Semi-Annual) Certifications are reviewed semi-annually by the Director of Federal Programs for accuracy and compliance with Federal requirements.

#### *Multiple Cost Objectives (Time and Effort Personnel Activity Reports – PARs)*

Applies to employees who do not work 100% of their time on a single Federal award/grant program or single cost objective but instead work under multiple grant programs or multiple cost objectives. A distribution of their salaries or wages must be supported by Personnel Activity Reports (PARs). The PARs must reflect an after-the-fact distribution of the actual activity of the employee and must account for the total activity for which the employee is compensated. The PARs must be prepared at least monthly and must coincide with one or more pay periods. The PARs must be completed and signed after-the-fact.

The PARs must be signed by the employee. The supervisor may sign in addition to the employee, but the signature of the supervisor alone is not sufficient for documentation. The PARs are submitted monthly to the Director of Federal Programs for review of accuracy and compliance with Federal requirements, who then forwards to the Director of Finance for final approval and cost reconciliation.

#### **Time and Effort Substitute System**

The US Department of Education (USDE) and the Texas Education Agency (TEA) have authorized the use of a substitute system for time and effort.

In the event that the district determines that it is in its best interest to use the Time and Effort Substitute System, the Management Certification shall be completed, signed by the Superintendent and filed with TEA in accordance with the established deadlines. Extensive training of staff shall occur at the time the system is implemented to ensure that all grant-funded staff and the grants management and business departments are aware of the requirements of this system.

#### *Substitute System for Time and Effort Reporting for Employees Supported by Multiple Cost Objectives*

San Angelo ISD elects to use the Substitute System for Time and Effort Reporting in lieu of the Personnel Activity Report (PAR) for employees supported by multiple cost objectives.

The Substitute System of Time and Effort Reporting is used in lieu of the Personnel Activity Report (PAR) for eligible employees who are supported by multiple cost objectives, have a predetermined schedule, and do not work on multiple activities or cost objectives at the exact same time on his or her schedule.

If the employee's schedule is not consistent from week to week, but changes regularly, that particular

employee is not eligible to use the Substitute System but must submit monthly PARs instead. If the employee is eligible to use the Substitute System, the employee must complete the TEA-approved Employee Schedule and Certification form on a semi-annual basis, at a minimum.

If the employee's predetermined schedule changes substantively (by more than 10%) during the year, the employee must complete and submit an updated Employee Schedule and Certification form. The Employee Schedule and Certification form must be completed and signed after-the-fact. The Employee Certification form must be signed by both the employee and the supervisor having first-hand knowledge of the work performed by the employee.

### **Job descriptions**

An integral component of an adequate financial management system is the development and maintenance of records documenting the duties and responsibilities of personnel and the employee's acknowledgement of their understanding of their duties and responsibilities.

Employee job descriptions are signed and dated by the employee as acknowledgement that the employee has full knowledge of their duties and responsibilities. Job descriptions are also signed and dated by the employee's immediate supervisor.

Employee job descriptions must be current. Employee job descriptions are updated as new assignments are made. The Director of Human Resources will monitor job descriptions to ensure they are kept up-to-date and that the job descriptions accurately and completely describe the work performed by the specific position. Job descriptions for positions that are split-funded are reviewed quarterly, at a minimum, to ensure the job description remains current.

Employee job descriptions for personnel paid from Federal funds must delineate all program or cost objectives under which the employee works. Job descriptions and duties must be specific to the particular grant program and clearly identify the functions and programs they benefit, including the fund source(s) from which the position is compensated. The program manager will ensure the job description aligns the activities of the position to the program goals of the fund source and ties the source of funds to the activity.

If a position benefits multiple cost objectives or programs, the job description will clearly define each program, function, and/or fund source and clearly identify and distinguish the duties and responsibilities for each respective program, function, and/or fund source.

If a position benefits a single cost objective or program, the job description will clearly indicate the employee is assigned 100% to the program. If a position that benefits a single cost objective is funded through multiple sources, a sentence will be added to the job description stating that the position is supported by a single cost objective even though its funding is split among multiple sources.

If a position has administrative duties, the job description will clearly delineate the administrative activities and identify the percentage of administrative activities compared to program activities.



The job description and assignment shall be supported by documentation such as grade books, master schedule, etc.

### **Employee Exits**

Any staff member who separates from employment with the district will be ineligible to attend any conference, workshop, or convention paid out of any district funds, when such attendance occurs after the separation date.

Any staff member who separates from employment with the district and attends a conference, workshop, or convention paid out of any district funds, when such attendance occurs after the separation date, will be liable for the costs of the conference, workshop, or convention and will not be reimbursed for such costs by the district.

The Human Resources Department is responsible for ensuring compliance with this requirement.

### **Roster of all grant funded staff**

The Grant Manager shall maintain an up-to-date roster of all grant funded staff to include the position title, annual salary, and funding source(s) by percentage. The roster of grant funded staff shall include all staff paid with non-federal grant funds whose compensation/benefits are paid as part of a matching or cost sharing requirement of a federal grant fund.

The home campus or department, grant manager, human resources, and business departments shall work collaboratively to ensure that the roster accurately reflects that data maintained in their respective area of responsibility. Discrepancies, if any, in the roster shall be brought to the attention of the grants management department.

The review of the roster shall include, but not be limited to the following:

- 1) Campus or department – ensure that the grant funded staff are assigned in the position title as noted on the roster. The master schedule or assignment of instructional staff must support the position title and funding source.
- 2) Human Resources – ensure that the position title and salary are correct as noted on the roster. In addition, the HR department shall ensure that each grant funded staff member has a signed job description on file for the position title noted on the roster. And, the HR department shall ensure that all grant-funded staff meet the state’s Certification or are Highly Qualified, as appropriate.
- 3) Business – ensure that the funding source(s) and salary are correct as noted on the roster. In addition, the business department shall ensure that the payroll distribution account code(s) are in accordance with the FASRG.
- 4) Grant Manager – ensure that the positions are authorized on the grant application and that the PEIMS Staff Data submitted to TEA is consistent with the position title, Role ID and object code.

The review shall occur on at least a quarterly basis throughout the school year to ensure that the roster of grant funded staff is accurate and up-to-date throughout the year.



### **Budgeting of grant funded staff**

The roster of grant funded staff shall be the basis for budgeting of grant funded staff. The percentage of time in each funding source shall be utilized by the Human Resources Specialist to create and enter the salary portion of the grant budget. The percentages shall be utilized by the Cash Manager/Budget Coordinator to enter the payroll distribution account code(s).

In addition, the business department shall ensure that the Grant Personnel Schedule of the grant application matches the budget and payroll account code(s). For example, if the Grant Personnel Schedule for Title I, Part A includes a position of a “008 – Counselor (6119)”, the budget and payroll account code distribution shall be entered in a 6119 object code.

The grants management, human resources and business departments shall work collaboratively to adjust the budget and payroll account code distributions of grant funded staff if the time and effort documentation consistently reflects that the percentage(s) across the funding source(s) is not a true reflection of the normal work schedule.

- Time and effort requirements for staff funded 100% from one grant (or working 100% of their time in a single cost objective)

The staff funded 100% from one grant source do not have to maintain periodic time and effort records. However, all employees must certify in writing, at least semi-annually, that they worked solely on the program for the period covered by the certification. The employee and his/her immediate supervisor must sign the Semi-Annual Certification Form (sample in Exhibit Section).

The timeline for semi-annual certifications shall be once per academic semester to coincide with teaching assignment each semester. The immediate supervisor shall submit all signed semi-annual certifications to the grant management department as noted below:

- 1) 1<sup>st</sup> Certification – Due by January 2021
- 2) 2<sup>nd</sup> Certification – Due by June 2021

The Grant Manager review shall consist of the following:

- 1) A review of the certification forms to ensure that every staff member and supervisor has certified that their schedule is 100% grant related
- 2) A test sampling of staff assignments, i.e. master schedule, duty schedule, etc. to verify the schedule is 100% grant related

The Grant Manager shall collect and review all Semi-Annual Certification Forms. Any certifications that reflect a percentage other than 100% shall be forwarded to the business department for adjustment of the grant payroll expenditures for the certification period. The Grant Manager shall file the certifications for audit purposes.

The business department shall prepare a journal ledger entry to correct the account distribution code(s) as appropriate. The Director of Finance shall post the entry to the finance general ledger.

- Time and effort requirements for staff split funded (funded from more than one (1) cost objective and/or grant programs)

Time and effort applies to employees who do one of the following:

- 1) Do not work 100% of their time in a single grant program
- 2) Work under multiple grant programs
- 3) Work under multiple cost objectives

These employees are required to maintain a Time and Effort Worksheet or to account for their time under a substitute system. Employees must prepare time and effort reports at least monthly to coincide with the district pay periods. Such reports must reflect an *after-the-fact* distribution of 100 percent of the *actual* time spent on each activity and must be signed by the employee and their immediate supervisor. Charges to payroll must be adjusted to coincide with preparation and submittal of the interim expenditure report required for TEA discretionary grants.

Grant-funded staff under this category shall complete a Time and Effort Worksheet (sample in Exhibit Section) to include the date, grant source, percentage worked in the grant source per day and the summary for the month (or pay cycle). The staff member and his/her immediate supervisor shall sign the time and effort report. The timeline for time and effort reports shall be once per month to coincide with the monthly payroll cycles as noted: below:

- 1) Monthly payroll 23rd of the month – Time & Effort reports are due by the 10<sup>th</sup> of the month for the prior month

The immediate supervisor shall submit all signed time and effort reports to the Grant Manager.

The Grant Manager review shall consist of the following:

- 1) A review of the time and effort reports to compare the summary percentage of grant-related work per funding source to the budgeted percentage utilized to charge the monthly (or semi-monthly) payroll charges
- 2) A test sampling of staff assignments, i.e. master schedule, duty schedule, etc. to verify the percentage of grant-related work per funding source
- 3) If the time and effort report reflects the same percentage, the report may be filed for audit purposes
- 4) If the time and effort report reflects a different percentage, the report shall be reconciled to reflect the correct payroll charges by grant funding source and forward the reconciliation to the business department for adjustment of the payroll charges on the general ledger

The business department shall prepare a journal entry to reclassify the expenditures as noted on the reconciliation of the time and effort report(s). According to federal regulations, the final amount charged to each grant award must be accurate, allowable and properly allocated.

## **902.74 Non-Payroll Expenditures**

Direct non-payroll expenditures include contracted services, supplies, travel and equipment. The expenditure of federal grant funds for non-payroll costs shall adhere to the district's purchasing policies and procedures. In addition to the normal purchasing process, all grant funds must be approved by the Grants Manager for each respective grant program, as appropriate.

The grants manager with approval authority for each federal grant is listed in Exhibit #1.

### **TEA Guidelines Related to Specific Costs**

The district shall adhere to TEA's Guidelines Related to Specific Costs as published to the TEA website. A copy of the guidelines shall be made available to all staff with authority to initiate and/or authorize a purchase or expenditure with federal grant funds. In addition, all staff with authority to initiate and/or authorize a purchase or expenditure, such as campus bookkeepers, campus and department administrators, business office staff, and grant department staff shall receive a copy of the latest guidelines. The guidelines shall be incorporated in the annual training for all of these staff members. These guidelines shall be posted on the district's website as a resource when expending federal grant funds.

### **Federal Guidelines Related to Unallowable Costs**

The district has developed local guidelines related to unallowable costs with federal grant funds. Although some of these costs may be allowable under the federal or state regulations, the district has determined that expenditures shall be unallowable with federal grant funds. The unallowable costs are noted below or in the Exhibit Section.

#### Unallowable Costs

1. Snacks that do not meet the Smart Snack federal and/or state guidelines:  
<http://www.fns.usda.gov/sites/default/files/allfoodsflyer.pdf>
2. Meals (during a Working Lunch or Professional Development) that exceed \$10 per person
3. Educational field trips to an amusement park
4. Incentives & Awards [Refer to Incentive Procedures]

## **902.75 Contracts and Professional Services with Grant Funds (2 CFR §200.319)**

All contracts and service agreements, etc. must be signed by the Superintendent or designee. Only the Superintendent or designee is authorized to sign a contract or agreement on behalf of the district. Contracts that exceed \$25,000 ([CH Local](#)) shall be approved by the Superintendent and the School Board.

The Superintendent has designated the Director of Purchasing as having signature authority for the LEA. An employee who signs a contract or agreement without proper authorization will be personally liable for the terms of the contract or agreement and the act may be grounds for termination of employment.

The Purchasing Department maintains a copy of the signed contract, agreement, or purchase order for services performed and the rationale or procedure for selecting a particular vendor.

Contracts or agreements in excess of \$10,000 describe conditions under which the contract may be terminated for cause or for convenience by the district, including the manner by which it will be effected and the basis for settlement. Appendix II to 2 CFR Part 200.

Contracts for more than the simplified acquisition threshold must address administrative, contractual, or legal remedies in instances where contractors violate or breach contract terms, and provide for such sanctions and penalties as appropriate. Appendix II to 2 CFR Part 200.

If the contract is to develop materials, concepts, or products, the agreement or contract contains provisions that protect and retain ownership of such materials, concepts, or products by TEA, the State of Texas, and the federal government, as applicable (including copyright, patent, trademark).

The Purchasing Department maintains evidence that awards were made only to contractors or consultants possessing the ability to perform successfully under the terms and conditions of the proposed contract or procurement.

The Purchasing Department maintains evidence that consultants were selected based on demonstrated competence, qualifications, experience, and reasonableness of costs and that consideration was given to contractor integrity, compliance with public policy, past performance, and financial and technical resources.

No contracts are entered into with employees of the district.

The Purchasing Department maintains evidence that an employee did not participate in selection or award of a contract if a conflict of interest was involved.

The vendor shall complete the Consultant Contract to include, at a minimum, the following documents:

- Consultant application
- W-9 Form for vendor identification and tax purposes
- Conflict of Interest Questionnaire
- Felony Conviction Notice
- Criminal Background and Fingerprinting (if working directly or indirectly with students)
- Certificate of Insurance (with the district as additional insured) if services will be rendered on district property

In addition, the Grant Manager shall review and approve all consultant services agreements for compliance with federal regulations regarding professional service costs (2 CFR 200.459).

The Grant Manager, Human Resources Department and Business Department review shall consist of the following:

- 1) Consultant and/or contractor has not been suspended or debarred (contracts greater than \$25,000)
- 2) The contract and/or funds have been approved in the grant application, if specific approval is required from the granting agency
- 3) The contract's nature and scope of service is directly related to the federal grant award activities
- 4) The past pattern of costs, particularly in the years prior to federal awards
- 5) The contract does not contain any proposal costs [not allowable under federal regulations]
- 6) Whether the proposed contracted services can be performed more economically by direct employment rather than contracting
- 7) Capability of the proposed vendor to perform the required services

- 8) The qualifications of the contracting firm or individual and the customary fees charged by the proposed vendor [A Resume, Vita or Statement of Qualifications shall be required for all contracts with Independent Contractors.]
- 9) The contract and/or consultant agreement meets the allowable costs principles.
- 10) A contract subject to Davis Bacon has the appropriate contract language  
The contract and/or consultant agreement fee for services do not exceed any federal grant or local limits

The Assistant Superintendent of Curriculum, shall review and approve all contracts. The review shall consist of the district's Contract and any other requirements specific to the contract and/or federal grants.

The final approval authority for all contracts shall be the Superintendent, unless the contract is over \$50,000, then the final approval authority shall be the Board of Trustees through approval at a regularly scheduled board meeting.

The date the district executes (signs) a contract for professional services shall be defined as the "obligation date". Since the district cannot obligate federal grant funds, except during the grant period, the district shall not execute a contract prior to, or after, a grant period; otherwise, the costs of the professional services shall be unallowable under the federal cost principles.

The district will execute a Letter of Intent with a third party prior to the issuance of a Notice of Grant Award (NOGA), as deemed appropriate.

All district contracts for professional services to be funded through a federal grant award shall comply with the following contract provisions as recommended in the Texas Education Agency's Guidance and Best Practices for Professional Services Contracts:

- The contract is only effective upon receipt by the district of the NOGA from the awarding agency.
- The contract period is aligned to the grant period of availability as stated on the NOGA from the awarding agency (period of availability).
- All services will be completed during the effective dates of the contract.
- All services will be invoiced monthly after services are received (rather than paid lump sum at the beginning of the period of availability before services are rendered) and paid upon verification of receipt of services.
- The regulations for procurement in 2 CFR §§200.318-323 are followed in issuing the contract.
- All professional services provided under the contract will follow the provisions of 2 CFR 200.459 Professional service costs.
- The contract identifies the funding sources that will be charged for the services provided, including the specific amount and/or percentage of the total contract amount to be charged to each funding source.
- The contract identifies and lists only reasonable, necessary, and allocable services to be provided during the period of availability of the funding sources listed in the contract.
- The administrative costs charged to the grant in the contract must comply with any limitations for administrative costs for funding sources (if applicable).

- The contract specifies that the invoice provided by the contractor will include the list of services provided, dates of services, and location(s) where services were provided during the billing period.

Additional district contract provisions shall include:

- The contract shall not have multi-year extensions without a “non-appropriation of funds” cancellation clause.
- The contract extensions, if included, shall restrict the contract renewals and/or extensions to either a “sole discretion of the district” or “mutual agreement” and not an “automatic renewal”.
- All products created as a result of the district shall be vested in the district and the district shall retain all intellectual property rights.

## **902.76 Approval of Grant Purchases and Expenditures**

The district shall adhere to the normal approval path for purchase orders with non-grant funds. In addition, all purchase orders with grant funds shall be reviewed and approved by the appropriate Executive Director of Schools, the Grant Manager, and the Directors of Curriculum and Instruction for curriculum purchases.

The Grant Manager review shall consist of the following:

- 1) The expenditure is *reasonable* and *necessary* (as defined in federal grant guidelines) and is allowable and allocable meeting the program intent and purpose and documented in the District Improvement Plan or Campus Improvement Plan based on the Comprehensive Needs Assessment.
- 2) The expenditure is not required by state law or local policy.
- 3) The expenditure has been approved in the grant application, if specific approval is required from the granting agency.
- 4) The expenditure meets the allowable costs principles.
- 5) The expenditure is allowable and approved in the grant application and is consistent with the grant purpose.
- 6) The expenditure is supplemental and not supplanting a local expenditure (NOTE: Refer to compliance issues related to supplement and supplant for additional guidance)
- 7) The expenditure has been competitively procured as required by law, as appropriate.
- 8) The expenditure has been approved by the governing body, as appropriate The School Board Policy CH Local has established the threshold of contract approval by the School Board at \$25,000.

In an effort to meet all obligation and liquidation requirements of grant funds, the following purchase order deadlines shall be adhered to by all purchase order originators. Timelines are determined by the program grant managers. The deadline set for all supply and equipment requisitions for Title I, Part A, Title I, Part C, Title III, Part A, and Title IV will be submitted by March 10, 2021.

In addition to the normal approval path of district expenditures, all grant expenditures shall be approved by the Grant Manager under the following circumstances:

- 1) Invoice amount exceeds the purchase order by \$50.00

- 2) Payment of an invoice will be paid by an account code(s) other than the original account code(s) that were used to encumber the purchase order
- 3) Travel expenditures, if not encumbered through the purchase order system
- 4) Non-purchase order payment such as petty cash, credit card, direct invoice, reimbursement, etc.
- 5) Reclassification of a prior expenditure from one account code(s) to another

All business department staff (accounts payable staff) shall adhere to the Accounts Payable Procedures for all check disbursements. Specifically, all checks issued by the district shall be verified, recorded, approved, issued and reconciled by multiple individuals to ensure segregation of duties.

### **Credit Card Purchases with Grant Funds**

The district shall use district-issued credit cards to make purchases with federal grant funds.

All personnel must undergo annual credit card training before gaining access to use a credit card. Expenses must be specifically outlined on a submitted requisition and approved purchase order. An original, detailed receipt shall be required for all credit card purchases with federal funds. If the purchaser does not submit an original, detailed receipt for audit purposes, the expenditure and/or reimbursement may not be charged to a federal fund. At no time shall district credit cards be used to withdraw cash.

The Grant Manager shall review and approve all credit card expenditures.

The Grant Manager administrative review shall consist of the following:

- 1) Original, detailed receipt includes an itemized list of what was purchased
- 2) The purchaser has documented a valid reason for the purchase which is consistent with the grant guidelines
- 3) The credit card purchase meets the allowable costs principles
- 4) Applicable and allowable expenses are pre-approved
- 5) Necessary training has been fulfilled

The district shall not reimburse any purchases made with a non-district credit card, except for travel-related expenditures, as appropriate.

Fraudulent credit cards purchases made with federal grant funds shall be grounds for disciplinary action, up to and including termination of employment. The appropriate legal authorities shall also be notified for criminal prosecution, as appropriate. Accidental use of a credit card to make an unauthorized purchase with federal grant funds may be subject to similar disciplinary action but shall require immediate (within 2 days from date of discovery) restitution to the district.

### **Petty Cash Purchases with Grant Funds**

San Angelo ISD shall not use a petty cash account to make purchases with federal grant funds.

An original, detailed receipt shall be required for all petty cash purchases with federal funds. If the purchaser does not submit an original, detailed receipt for audit purposes, the expenditure and/or reimbursement may not be charged to a federal fund.

The Grant Manager shall review and approve all petty cash expenditures.

The grant administrative review shall consist of the following:

- 1) Original, detailed receipt includes an itemized list of what was purchased
- 2) The purchaser has documented a valid reason for the purchase which is consistent with the grant guidelines
- 3) The petty cash purchase meets the allowable costs principles.

The district shall reimburse any purchases made with a personal cash funds, except for travel-related expenditures, as appropriate.

## **902.77 Travel Expenditures with Grant Funds (Students & Staff) (2 CFR §200.474)**

The district may use federal grant funds for travel costs. All travel-related expenditures from grant funds shall comply with the allowable federal cost principles, the State Texas-Travel Guidelines, School Board Policy and the district's travel guidelines. The allowable rates of reimbursement shall be the lesser of the federal rates or local rates. For example, if the federal rate of reimbursement for mileage is .575 cents but the local rate established in [Board Policy DEE](#).

The travel-related expenditures with grant funds shall fall within the grant period, unless a specific exception is allowable by the granting agency.

The following guidelines shall apply to the expenditure of grant funds for staff, student and/or parent travel, as appropriate.

- A Completed Trip Report for all travel
- Registration fees – registration fees shall be allowable if the event is related to grant activities. Registration fees may be paid from the current grant period for an event during the next grant period only if there is an absolute deadline to register for the event. Early registration deadlines shall not apply. Recreational or social events subject to an additional fee, above and beyond the registration fee, shall not be allowed with grant funds.
- Meals – meal expenses for overnight travel (in accordance with local travel guidelines) shall be allowed for district employees and students. Non-overnight travel meals expenses shall not be allowed. The district shall advance or reimburse meal expenses, subject to the GSA limits, on an *accountable* per diem basis only. The traveler shall submit a written certification [Completed Trip Report] with the actual meal costs for work-related meals, or shall return the unused meal funds to the district. The written certification (Completed Trip Report) shall be required in lieu of actual receipts. The meal per diems shall be adjusted in accordance with IRS regulations regarding the day of departure/return and meals provided without cost as part of the registration fee.



- Lodging – lodging expenses for overnight travel (in accordance with local travel guidelines) shall be allowed. The district shall pay for lodging expenses up to the GSA limits. Receipts shall be required for all lodging expenses. Recreational or personal services such as gyms, spas, etc. shall not be allowed with grant funds.
- Transportation – transportation expenses shall be allowed for *reasonable* expenses such as flight, rental car, taxi, shuttle, mileage reimbursement, etc. (in accordance with local travel guidelines).
- Receipts shall be required for all transportation expenses to the extent that a receipt is available. Transportation expenses shall be reasonable and limited to the guidance in the cost principles.

No grant funds shall be used for travel expenditures of non-district staff such as spouses. The district shall not allow any “family-friendly” travel expenditures, such as dependent care travel costs, with federal grant funds.

The Grant Manager shall review and approve all travel-related expenditures paid with federal grant funds.

The Grant Manager review shall consist of the following:

- 1) All original, detailed receipts include an itemized list of what was purchased
- 2) The traveler has documented a valid reason for the travel which is consistent with the grant guidelines and purpose
- 3) The travel expenditures meet the allowable cost time and e principles
- 4) The travel is not for the Superintendent or other individual (non-employee such as family member, School Board, etc.)
- 5) The travel is for students during an educational field trip or other approved activity in accordance with grant guidelines and purpose
- 6) The travel is not for a contractor or consultant for the *their* professional development
- 7) The travel was approved by the granting agency, as appropriate (for example: out-of-the-country travel)

The San Angelo ISD Travel Processes and Procedures Manual has all requirements and allowable costs included for State and Federal funded expenditures.

## **902.78 Preparing Expenditure Reports & Draw Down of Funds**

### *Draw-down of Grant Funds*

The district shall on at least a monthly, or as allowed or required by the grant guidelines, draw-down grant funds that have been spent in accordance with the grant guidelines. The draw-down shall be for all expenditures to date, less grant funds received to date, as verified by a financial general ledger. The expenditures shall be net of all refunds, rebates, discounts, credits, and other adjustments, if any.

The district shall submit a draw-down of federal grant funds only when the following has occurred:

- The expenditure has been made as evidenced by distribution of a paycheck to a grant funded staff member or mailing, e-paying, or delivering a payment to a vendor.

**At no time shall the district draw-down any “advanced” cash payments, unless specifically allowed by the granting agency.**

The draw-down of grant funds from the granting agency shall be initiated by the business department, Cash Manager/Budget Coordinator. A detailed summary general ledger of each grant fund should be generated to determine if the district is entitled to draw-down funds, i.e. if the granting agency owes the district any funds. Grant managers should regularly generate a detailed expenditure report for review and to verify proper coding.

**If a grant has a matching requirement, the district shall draw-down only the allowable amount after verifying compliance with the level of matching expenditures.**

The Grant Manager review shall consist of the following:

- 1) A review of the detailed general ledger for any unusual charges or reclassification of expenditures
- 2) A test sampling of either unusual or large expenditures to ensure that the expenditures were reviewed and approved by all designated staff
- 3) Monitor the percentage of expenditures-to-date to ensure that the grant funds are expended on a timely basis throughout the grant period [NOTE: TEA may disallow grant fund expenditures that appear to be made outside of the grant period or so late in the grant period that the district and its student did not benefit from the delayed expenditure.]
- 4) Authorize [in writing] the business department to draw-down the available grant funds

Upon approval from the Grants Manager, the business department, Cash Manager/Budget Coordinator, shall prepare the paper or electronic draw-down request. The amount of the receivable shall be recorded on the general ledger and a copy of all supporting documentation such as the detailed general ledger, approval from the grant management department, and other supporting documentation shall be filed for audit purposes. The Director of Finance certifies the draw-down request. The Cash Manager/Budget Coordinator shall prepare the journal ledger entry and the Bank Reconciliation Clerk shall post the to the finance general ledger.

If manual approval of an electronic draw-down is required by the granting agency, the business department shall comply with the manual requirements. For example, TEA at times requests supportive information related to a drawn down such as a detailed general ledger, narrative justification, or summary of expenditures by object code. Upon a request from the TEA, the business department, Director of Finance or the Comptroller, shall respond to the request within the allotted time to avoid designation as a “high risk” grantee.

The business department, Director of Finance, shall be responsible to ensure that the requested draw down amount does not exceed a grant-specific draw down amount, or percentage.

The final draw-down of grant funds from the granting agency shall be made within the allowable timeframe. The grant liquidation guidelines shall be adhered to in making final payment for all goods and services received and *placed into service* before the end of the grant period. The draw down process shall be the same as a monthly or periodic draw down, except that all refunds, rebates, credits, discounts or other adjustments to the general ledger must be recorded in the general ledger prior to submitting the final draw down request. [NOTE: There shall be no outstanding purchase orders or pending liquidations at the

time of the final draw down of grant funds.] The final draw-down shall be reviewed and approved in the same manner as a periodic draw-down.

Federal regulations (CFR 200.415) requires that the district certify the accuracy of the annual and fiscal reports or vouchers requesting payments be signed by the authorized individual(s). The Grant Manager and Business Department shall jointly certify every draw-down of funds, including the final expenditure report (draw-down of funds) as noted below:

*By signing this report, we certify to the best of our knowledge and belief that the reports is true, complete and accurate, and the expenditures, disbursements and cash receipts are the purposes and objectives set forth in the terms and conditions of the federal award. We are aware that any false, fictitious, or fraudulent information or omission of any material fact, may subject us to criminal, civil, or administrative penalties for fraud, false statements, false claims or otherwise.*

If a final draw down deadline is missed, the business department, Cash Manager/Budget Coordinator, shall contact the granting agency to determine if a process exists to request a filing deadline extension. TEA has developed procedures to request an extension for filing expenditure reports. The request form must be completed, signed by the Superintendent and filed with TEA within 30 days of the final expenditure report deadline.

The receivable from the granting agency shall be recorded in the general ledger. The same process for preparation and posting of the general ledger entry as a periodic draw-down shall be adhered to. [NOTE: The revenues realized and the expenditures should be equal at the time of the final draw down of grant funds.]

### **Receipt of Grant Funds**

All district staff, especially those assigned with federal grant duties, shall adhere to the Cash Management Procedures. Specifically, all cash received by the district shall be deposited, recorded reconciled by multiple individuals to ensure segregation of duties.

The district shall record all grant fund receivables upon receipt from the granting agency. The receipt of grant funds shall be posted to the general ledger to the appropriate receivable account code. In the event that the grant funds received do not match the recorded receivable, the business department, Cash Manager/Budget Coordinator, shall contact the granting agency to determine the discrepancy. If the granting agency has reduced and/or increased the grant funds paid to the district, a general ledger adjustment shall be posted to the appropriate revenue and receivable accounts. The Cash Manager/Budget Coordinator or Director of Finance shall prepare the adjusting journal ledger entry and the Bank Reconciliation Clerk shall post the entry to the finance general ledger.

The district will not maintain grant funds in a separate bank account.

The district has elected to draw down federal grant funds under the cash reimbursement program guidelines, i.e. after final payments to the payee are completed. No interest shall be earned, recorded, nor returned to the granting agency as a result of the cash reimbursement program.

### **Tracking and Recording Receivables**

On at least a monthly basis, the business department, Cash Manager/Budget Coordinator, shall review all pending receivables. Aged receivables, defined as greater than 60 days from the date of recording, shall be investigated and resolved by contacting the granting agency.

At the end of the fiscal year, all known and measurable receivables shall be recorded to the general ledger to the appropriate grant code. The Cash Manager/Budget Coordinator shall prepare the journal ledger entry and the Bank Reconciliation Clerk shall post the entry to the finance general ledger.

## **902.8 Grant Compliance Areas**

The district shall ensure that it is in compliance with all provisions and assurances of all grant programs. In addition, the district shall comply with grant requirements such as *supplement not supplant*, comparability, indirect cost, and maintenance of effort spending levels.

### **902.81 Supplement, Not Supplant**

The term —supplement, not supplant is a provision common to many federal statutes authorizing education grant programs. There is no single supplement, not supplant provision. Rather, the wording of the provision varies depending on the statute that contains it.

Although the definition may change from statute to statute, supplement not supplant provisions basically require that grantees use state or local funds for all services required by state law, State Board of Education (SBOE) rule, or local policy and prohibit those funds from being diverted for other purposes when federal funds are available. Federal funds must supplement—add to, enhance, expand, increase, extend—the programs and services offered with state and local funds. Federal funds are not permitted to be used to supplant—take the place of, replace—the state and local funds used to offer those programs and services. [TEA Supplement, Not Supplant Handbook, 2018]

The district process to ensure that all grant funded activities are supplemental shall be a collaborative effort between the grants management, business and purchasing departments. The departments shall receive training and be aware of the supplement not supplant provisions.

The Grants Manager shall review and approve all purchase orders (and non-purchase order payments). The Grant Manager review shall include a determination if the planned purchase and/or expenditure meet one of the following guidelines:

- 1) The grant funds will be used to enhance, expand, or extend required activities. Examples may include before/after tutoring, additional research-based instructional programs, or other supplemental expenditures not required by state law or local policy.
- 2) The grant funds will be used for specific grant activities included the grant application that are above and beyond the activities funded with local funds.
- 3) The grant funds will be used to supplemental grant activities as noted on the DIP or a CIP.

Program-specific supplement, not supplant provisions shall be complied with in addition to the overall federal funds requirements.

## **902.82 Comparability**

Comparability of services is a fiscal accountability requirement that applies to local educational agencies (LEAs) that receive funds under Title I, Part A of the Elementary and Secondary Education Act of 1965 (ESEA), as reauthorized by the Every Student Succeeds Act (ESSA). The intent of the comparability of services requirement is to ensure that an LEA does not discriminate (either intentionally or unintentionally) against its Title I schools when distributing resources funded from state and local sources simply because these schools receive federal funds. [TEA Title I, Part Comparability of Services Guidance Handbook, 10/2017]

The business department, Director of Finance, shall conduct the comparability test on an annual basis and complete the Title I, Part A Comparability Assurance Document (CAD). The business department, Director of Finance shall complete and submit the Comparability Computation Form (CCF) to TEA by the mid-November annual deadline.

For purposes of determining comparability, a district may exclude state and local funds expended for language instruction educational programs and the excess costs of providing services to children with disabilities as determined by the district. 29 U.S.C. 6321(c)(5)

A district shall be considered to have met the comparability requirements if the district has filed with TEA a written assurance that the district has established and implemented:

1. A district-wide salary schedule;
2. A policy to ensure equivalence among schools in teachers, administrators, and other staff; and
3. A policy to ensure equivalence among schools in the provision of curriculum materials and instructional supplies. 20 U.S.C. 6321(c)(2)

In completing the CAD and CCF, the business department, Director of Finance, shall follow the process outlined below [and illustrated on the workflow]

- 1) Determine if the district is exempt from the comparability requirement. If so, complete and submit CAD and stop here.
- 2) If not exempt, the comparability testing process should continue as noted below:
  - a. List all campuses in the CCF comparability testing
  - b. Identify all campuses on the CCF as Title I Part A, skipped, or non-Title I Part A
  - c. Determine whether to include dedicated EE and/or PK campuses in the comparability testing
  - d. Select test method 1, 2, or 3 and use it consistently to all campuses being tested
  - e. Complete the CAD for review by the grant management department. After review and approval by the grants management department, the CAD and CCF should be forwarded to the Superintendent for signature.
  - f. Submit the CAD and CCF to TEA by the mid-November deadline

If TEA determines that the district is non-compliant, the business and grants management departments shall work collaboratively to address the non-compliance. In addition, the district shall adjust the budgets as appropriate to until the district is in compliance with the comparability requirement.

### **902.83 Indirect Cost**

Grantees must have a current, approved federal indirect cost rate to charge indirect costs to the grant. The indirect cost rate is calculated using costs specified in the grantee's indirect cost plan. Those specified costs may not be charged as direct costs to the grant under any circumstances. [TEA Indirect Cost Handbook, 2013]

The district shall apply for an indirect cost rate through the federal granting agency or pass-through entity (TEA) in accordance with the current regulations. The Comptroller shall complete and submit an Indirect Cost Rate Proposal by the established deadline as specified by the pass-through entity (TEA) on the Indirect Cost webpage at: <http://tea.texas.gov/index4.aspx?id=3842>

San Angelo ISD has indirect cost rates assigned for the 2020 fiscal year that was negotiated and communicated to the District by TEA. The rates are 1.532 Restricted Rate and 18.650 Unrestricted. In 2015 the District applied for an extension of that cost rate for an additional four years. After the extension period, the District will submit an indirect cost rate proposal to TEA for new indirect cost rate. After any application and negotiation for an indirect cost rate an extension of the rate for up to four years may be requested. The approved indirect cost rate may be used to charge indirect costs to federal programs. The funding received for the indirect costs is transferred from special revenue fund to the general fund when received.

The district's Indirect Cost Rate, or the maximum allowable rate, whichever is less shall be used to post Indirect Costs for federal funds to the General Fund. The business department, Director of Finance, shall prepare a general ledger entry for the indirect costs. The Cash Manager/Budget Coordinator shall post the entry to the finance general ledger.

### **902.84 Maintenance of Effort**

The district shall comply with the Every Student Succeeds Act (ESSA) and Individuals with Disabilities Act (IDEA) maintenance of effort requirements.

#### ESSA MOE

Federal statute requires that local education agencies (LEAs) receiving Title I, Part A funds must continue to maintain fiscal effort with state and local funds. An LEA may receive its full Title I, Part A entitlement if either the combined fiscal effort per student or the aggregate expenditures for the preceding fiscal year was not less than 90 percent of the combined fiscal effort or aggregate expenditures for the second preceding fiscal year. Maintenance of Effort (MOE) is determined using state and local operating expenditures by function, excluding expenditures for community services, capital outlay, debt service, and supplementary expenses as a result of a Presidential declared disaster, as well as any expenditures from funds provided by the federal government. [TEA ESSA MOE Handbook]

The business department, Director of Finance, shall compute the MOE using the TEA ESSA LEA MOE Determination Calculation Tool during the budget adopted process and at the end of the fiscal year. Non-compliance with ESSA MOE will result in a reduction of ESSA funds in the exact proportion by which the district fails to meet the MOE requirement; therefore, the business department shall plan for the reduction of grant funds at the local level. If the ESSA MOE falls below the required level, the business and grant management departments shall collaborate to develop a plan to bring the district into compliance with the MOE requirements.

#### IDEA-B MOE

An LEA that accepts IDEA-B funds is required under IDEA-B to expend, for services to students with disabilities, at least an amount equal to 100% of the state and/or local funds it expended on students with disabilities during the previous year. Federal law provides four methods of demonstrating compliance (or “maintaining effort”), as described in the Methods of Determining Compliance section. [TEA IDEA-B MOE Guidance Handbook, 2014]

The business department, Director of Finance, shall compute the MOE using the TEA IDEA-B LEA MOE Calculation Tool during the budget adopted process and at the end of the fiscal year. Non-compliance with IDEA-B MOE will result in a reduction of IDEA-B funds in the exact proportion by which the district fails to meet the MOE requirement; therefore, the business department shall plan for the reduction of grant funds at the local level. If the IDEA-B MOE falls below the required level, the business and grant management departments shall collaborate to develop a plan to bring the district into compliance with the MOE requirements.

The business department shall code all special education expenditures that qualify as exceptions to a specific sub-object for tracking purposes. For example, if the district makes a long term purchase of equipment for a special education student, the district should track that expense separately to apply that cost as an exception during the MOE calculation.

As part of the IDEA-B grant application process, the Grant Manager will need to know the prior year Special Education expenditures and the next fiscal year budgeted Special Education Expenditures. The business department, Director of Finance, shall provide these amounts to the Grants Manager not later than June 20, to ensure that the most accurate amounts are reflected in the grant application. Changes to these amounts, as they are known, by the business department, Director of Finance, shall be submitted to the Grant Manager, as appropriate.

### **902.85 Reporting Requirements**

The district shall ensure that all reporting requirements for grant programs are met within the established timelines. A master list of all activity, progress, evaluation, and expenditure reports shall be created to include the grant program, report due, responsible person(s), and due date. Completion of the reports may require the collaboration of several departments; however, the ultimate responsibility for the reporting requirement shall be as noted below:

- Programmatic reports such as activity, progress and evaluations – Grants Management Administrators



- Expenditure reports such as interim, draw down and final expenditure reports – Business department, Director of Finance, Comptroller and Cash Manager/Budget Coordinator
- Compliance reports such as Comparability, Maintenance of Effort, Indirect Cost, etc. – business department, Director of Finance
- Highly Qualified Staff reports – Human Resources department, Director of Human Resources

The Director of Federal Programs shall monitor the overall master list to ensure that all reporting requirements have been completed by the appropriate campus and/or department.

### **Program Evaluations**

The program manager will monitor Federal grant-supported activities to assure compliance with applicable Federal requirements and to assure that performance goals are being achieved. Actual accomplishments will be compared to the objectives of the program.

Activities for monitoring and evaluating program performance include, but are not limited to:

- Interviews with campus administrators
- Collaboration with region Education Service Center XV staff for training, technical assistance, and consultation services
- Review of applicable data
- Leadership team meetings on a regular basis to review program activities
- Parent, teacher and campus staff surveys

### **902.86 Grant Monitoring and Accountability**

The district shall ensure that all grant funds are consistently monitored throughout the grant period. The monitoring shall include, but not be limited to:

- Compliance with federal requirements such as cost principles, audit, reporting requirements, etc.
- Monitoring of grant expenditures are properly documented and meet all allowable costs
- Monitor grant performance such as internal controls, audit findings, over/under expenditures, etc.
- Implement strategies to deter, mitigate and eliminate waste and fraud in the expenditure of grant funds

The Grant Manager for each federal grant shall be responsible for the programmatic and evaluation compliance and the Director of Federal Programs shall be responsible for the financial compliance. A list of the Grant Managers by federal grant is included in the Exhibit section. The use of “Grant Manager” throughout this document shall refer to the specific Grant Manager by federal grant as listed on Exhibit 1.

The Grant Manager shall monitor the timing of grant activities throughout the grant period, especially as they relate to the desired outcomes. The Business Department shall monitor the timing of grant expenditures, especially as they relate to the period of availability of grant funds. If either the grant activities or grant expenditures reflect that the district will not accomplish the grant activities during the grant period, the Federal/State Programs and Business Departments shall work collaboratively to develop an action plan to ensure that the federal grant goals are met. The oversight of grant activities and expenditures shall include, but not be limited to, the following:

- Cost overruns or high unit costs



- Construction projects – certification of project completeness (as evidenced by the AIA)
- Significant developments that may result in an inability to complete the grant activities

The district shall maintain documentation to support all grant expenditures and provide the documentation upon request to the district’s external auditors, granting agency or other oversight agency, as appropriate.

Auditing findings or deficiencies shall be addressed in a timely manner upon receipt of the notification. The business, human resources and federal/state programs staff shall work collaboratively to develop and implement a Corrective Action Plan to resolve the findings or deficiencies. The Superintendent, or designee, shall approve the Corrective Action Plan and monitor the timely implementation of corrective strategies.

The district shall disclose to the granting agency if any federal grant funds have been subject to fraud to district staff and/or contractors (vendors). Corrective actions, as appropriate, shall be implemented to remedy the loss of grant funds due to fraud.

**Remedies for Non-Compliance**

The district may be subject to consequences due to non-compliance with federal regulations. The district shall strive to maintain compliance, but shall respond appropriately to all notifications of non-compliance from the federal granting agency or pass-through agency (TEA).

**Grant Closeout Procedures**

The district shall submit all grant closeout documents to the granting agency or pass-through agency, as appropriate and requested. Grant closeout procedures shall include, but not be limited to:

- Ensure that no obligations are made after the grant period end date
- Liquidate all obligations incurred during the grant period
- Submit the final grant program performance report, if any
- Submit the final grant expenditure report, if any
- Drawdown all the expended grant funds (reimbursement request) – Match the grant expenditure draw-downs with the finance general ledger
- Certify that the final drawdown of federal grant funds are accurate (Certification)
- Refund any excess grant funds, interest, or other payables to the granting agency or pass-through agency
- Account for any real and/or personal property on hand at the end of the grant period
- Maintain necessary and auditable documentation

**902.87 Legal Authorities and Helpful Resources**

The following links contain relevant grants management requirements. Staff should be familiar with these materials and consult them when making decisions related to the federal grant.

- Education Department General Administrative Regulations (EDGAR)
  - <http://www2.ed.gov/policy/fund/reg/edgarReg/edgar.html>

- Uniform Administrative Requirements, Cost Principles and Audit Requirements for Federal Awards (2 CFR Part 200)
  - <http://www.ecfr.gov/cgi-bin/text-idx?SID=ccccf77e01c9e6d4b3a377815f411704&node=pt2.1.200&rgn=div5>
  
- USDE's Uniform Administrative Requirements, Cost Principles and Audit Requirements for Federal Awards (2 CFR Part 3474)
  - [http://www.ecfr.gov/cgi-bin/text-idx?SID=ccccf77e01c9e6d4b3a377815f411704&tpl=/ecfrbrowse/Title02/2cfr3474\\_main\\_02.tpl](http://www.ecfr.gov/cgi-bin/text-idx?SID=ccccf77e01c9e6d4b3a377815f411704&tpl=/ecfrbrowse/Title02/2cfr3474_main_02.tpl)
  
- Federal program statutes, regulations, and guidance
  - <http://www.ed.gov/>
  - <http://www2.ed.gov/policy/landing.jhtml?src=pn>
  
- State regulations, rules, and policies
  - <http://www.tea.texas.gov/>

## 902.9 Grant Awards [Exhibit 1]

List of Grant Awards (including Grant Manager, grant funding source, grant period, and grant amount)

NOGA ID	Grant Title/#	Award Date	Fed Awd. # CFDA #	Grant Period	Amount	Grant Manager
20610101226903	Title I, Part A (211)	07/1/2019	S010A190043 84.010A	07/01/2019 09/30/2020	\$3,940,838	Director of Federal Programs
20615001226950	Title I, Part C (Migrant) (212)	08/26/2019	S010A190044 84.011A	08/26/2019 09/30/2021	\$42077	Education Service Center Rg 15
20694501226903	Title II, Part A (255)	07/1/2019	S367A190041 84.367A	07/01/2019 09/30/2020	\$657,698	Director of Federal Programs
20671001226903	Title III, Part A (LEP) (263)	07/1/2019	S365A190043 84.365A	07/01/2019 09/30/2020	\$78,166	Director of Federal Programs
20671003226903	Title III, Part A (Immigra nt) (263)	07/1/2019	S365A190043 84.365A	07/1/2019 09/30/2020	\$21,353	Director of Federal Programs
20680101226903	Title IV, Part A, Subpart 1 (289)	07/1/2019	S424A190045 84.424A	07/01/2019 09/30/2020	\$253,301	Director of Federal Programs
20420006226903	Carl D. Perkins Basic Formula (244)	07/01/2019	V048A190043 84.048A	07/01/2019 08/15/2020	\$194,156.	Director of Career and Technology Ed.
206600012269036 600	IDEA-B	07/1/2019	H027A190008 84.027A	07/1/2019 09/30/2020	\$3,11,037.	Director of Special Programs
206610012269036 610	IDEA – B Pre- School	07/1/2019	H173A190004	07/26/2019 09/30/2020	\$140,669.	Director of Special Programs

[TEA Grant Opportunities:](#) [The following resources are available online for each grant program]

General and Fiscal Guidelines  
 Program Guidelines  
 Program-Specific Provisions and Assurances

[Exhibit 2]

## **San Angelo Independent School District Confidentiality and Use of Information Agreement**

The Business, Federal and State Departments work with various employees, vendors, departments, and schools throughout the district. The work performed by these Departments is very sensitive; therefore, a high level of trust must be maintained between the Division and the employees of the district. Employees should feel very comfortable in discussing issues with the Departments and know that these issues would only be discussed with appropriate management, as appropriate.

Any and all information related to the work performed by the Business, Federal and State Departments should be kept confidential. This information should only be discussed with the employee, vendor, administrative supervisor, or Superintendent, as appropriate.

Among the most critical information is documentation related to employee's Personally-Identifiable Information (PII) such as health, benefits, financial, family members, or other personal information. Violators will be subject to discipline, employment termination, and/or may be reported to the appropriate legal authorities. Violations of some protected information, such as health or medical information, is also protected by federal laws, such as HIPPA.

Each business, federal and state office staff member is authorized to access specific district financial and/or payroll system(s) for job-related purposes only. Use of the systems for personal reasons/benefit, or mere curiosity, is strictly prohibited. If a business, federal and state office staff member is able to access information that he/she believes to be restricted from his/her access, he/she shall not gain access or view the information and shall immediately report the security breach to the Director of Technology.

I have read the above statements and I agree to keep any and all information related to the work performed by me confidential. I will only discuss this information with the individuals mentioned above, as appropriate. I will not add, change or delete information without proper authorization nor will I view or use information that I can access for personal reasons or curiosity. I understand that violation of this agreement could result in disciplinary action, up to and including termination.

All business, federal and state office staff shall sign a Confidentiality Agreement on an annual basis.

\_\_\_\_\_  
Business/Federal/State Employee (Signature)

\_\_\_\_\_  
Business/Federal/State Employee (Printed Name)

\_\_\_\_\_  
Date

### Forms & Procedures Available for Review

Forms/Exhibits	Procedures
Federal Grant Information	End of Month Procedures
Confidentiality Agreement	Fixed Asset Procedures
Journal Voucher Form	Internal Control Procedures
Acknowledgment of Responsible Use Guidelines Form (RUG)	Purchasing Procedures
Sample Staff FTE Report	Adding/Renewing Vendors Procedures
PEIMS Population Served Table C030	Contract Management Procedures
Local Government Officer Conflict of Interest Form	Hiring Processes & Procedures
Lobbying Certification Form	Timekeeping Procedures
Vendor Application Form/Package	Accounts Payable Procedures
IRS Form W-9	Travel Guidelines & Procedures
Conflict of Interest Questionnaire	Cash Management Procedures
Felony Conviction Form	Incentive & Award Procedures
Fingerprinting Form – Vendors	State Compensatory Procedures
Contract Review Checklist	Bilingual/ESL Procedures
Allowable/Allocable Costs Worksheet	
Supplemental Duties Job Description and Pay Notice	
Summary of Employee Benefits	
Compensation Plan	
Personnel Requisition Form	
Personnel Recommendation Form	
Stipend & Extra Duty Pay Scale	
Semi-Annual Certification of Time and Effort	
Time & Effort Worksheet	
Travel Authorization/Settlement Form	
Procurement Card Transaction Report	