

POLICY GUIDE

FINANCES

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Reimbursement of Federal and Other
Grant Expenditures

Mar 23

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[See POLICY ALERT Nos. 190, 218, and 230]

6112 REIMBURSEMENT OF FEDERAL AND OTHER GRANT EXPENDITURES

The Cash Management Improvement Act (CMIA) and related Federal regulations require a State to minimize the time elapsing between the transfer of funds from the United States Treasury and the expenditure of funds for program purposes. This requirement applies to grantees such as the State of New Jersey and their subgrantees, such as a school district. The State of New Jersey and school districts must assure funds have been, or will be, spent within a minimal amount of time after having been drawn from the Federal government.

In accordance with this requirement, the New Jersey Department of Education (NJDOE) has implemented a reimbursement request system of payment. The procedures as outlined in the New Jersey Department of Education Policies and Procedures for Reimbursement of Federal and Other Grant Expenditures shall be followed by school districts in submitting reimbursement requests. Reimbursement requests for entitlement grant awards under the Every Student Succeeds Act (ESSA), the Individuals with Disabilities Education Act (IDEA), the **Strengthening Career and Technical Education for the 21st Century Act** ~~Carl D. Perkins Career and Technical Education Improvement Act of 2006~~, and any other program designated by the NJDOE shall be made using the NJDOE's Electronic Web-Enabled Grant (EWEG) System.

Reimbursement requests by the School Business Administrator/Board Secretary or designee shall be made for individual titles and awards using the payment functionality of the EWEG system. Only one reimbursement request per month may be submitted for an individual title, award, or subgrant. Reimbursement requests may only be for expenditures that have already occurred or will occur within three business days of receipt of funds.

The submission of a reimbursement request constitutes a certification by the School Business Administrator/Board Secretary that the school district has previously made the appropriate expenditures and/or will make the expenditures within three business days of receipt of funds and that the expenditures are allowable and appropriate to the cost objective(s) of the subgrant.



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The Superintendent or designee is responsible for submitting an amendment application to the NJDOE for approval if a new budget category for which no funds were previously budgeted or approved has been created. The Superintendent or designee is responsible for submitting an amendment application to the NJDOE for approval if cumulative transfers among expenditure categories exceed ten percent of the total award. The Superintendent or designee is responsible for monitoring the cumulative ten percent level of fiscal change.

Reimbursement requests must be in accordance with approved grant applications. A reimbursement request may be submitted at any time after the subgrant has received final NJDOE approval. Reimbursement requests submitted at least ten business days before the end of the month but no later than the fifteenth day of the month will be reviewed and, if approved, processed for payment the first business day of the following month. School districts will normally receive payment by the fifth business day of the month and will be able to track the grant's payment history in EWEG through the payments link of the grant application.

Reimbursement requests must contain a brief description of the expenditures for which reimbursement is being requested. Individual line items need not be detailed. Expenditures must be supported by documentation at the school district level but should not be submitted to the NJDOE with a reimbursement request. The Superintendent or designee is responsible to maintain supporting documentation for seven years and for making it available to the NJDOE, the United States Department of Education, and/or their authorized representatives upon request. Documentation for salary expenditures is subject to the requirements of the Federal Uniform Grant Guidance. Documentation for all other expenditures must include evidence that the expenditures are allowable costs and of the relationship of the expenditure to the subgrant's cost objectives.

The NJDOE staff will review reimbursement requests to determine that they meet the subgrant's criteria. When a reimbursement request is approved or denied, the school district will receive an email notification through the EWEG system. Approval of a reimbursement request by NJDOE does not imply approval of the expenditures as allowable or appropriate to the subgrant's cost objectives as the approval of expenditures will continue to be processed through the final report.



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The School Business Administrator/Board Secretary or designee assumes responsibility for assuring that all funds requested through the EWEG system either have already been expended, or will be expended within three business days of receipt of funds.

New Jersey Department of Education Policies and Procedures for Reimbursement of Federal and Other Grant Expenditures – March 2014

Adopted:



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Federal Funds – Duplication of Benefits

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[See **POLICY ALERT No. 230**]

6115.04 FEDERAL FUNDS – DUPLICATION OF BENEFITS

A requirement for a Board of Education/local education agency (LEA) who accepts funds from the Coronavirus Response and Relief Supplemental Appropriations Act (CRRSAA) – Elementary and Secondary School Emergency Relief Fund (ESSERF II); American Rescue Plan Elementary and Secondary Schools Emergency Relief (ARP ESSER); and all Federal programs and grants is for the LEA to have a Duplication of Benefits (DOB) Policy. DOB occurs when a person, household, business, government, or other entity receives financial assistance from multiple sources for the same purpose, and the total assistance received for that purpose is more than the total need for assistance.

The School Business Administrator/Board Secretary shall be responsible for ensuring no DOB occurs and will be responsible for ensuring compliance by subcontractors, subrecipients, and other partners.

To comply with DOB requirements, an LEA that accepts Federal funds is required by the Coronavirus Aid, Relief, and Economic Security (CARES) Act to establish and follow procedures to ensure that DOB does not occur. Establishing a process to effectively identify and prevent DOB is critical for the LEA to effectively manage multiple active funding streams related to coronavirus response and efficiently target resources to meet unmet needs within the school district. The Board of Education is solely responsible for ensuring that an actual DOB does not occur.

To prevent DOB, the LEA will have:

1. A requirement that the LEA must agree to repay assistance that is determined to be duplicative. This may be documented through a subrogation agreement or similar clause included in the agreement with the LEA. The LEA will establish a protocol to monitor compliance based on risk of DOB for each activity; and



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Federal Funds – Duplication of Benefits

2. A method of assessing whether the use of these funds will duplicate financial assistance that is already received or is likely to be received (such as insurance proceeds) by acting reasonably to evaluate the need and the resources available to meet that need. The LEA will evaluate current programs available at the local, county, State, and Federal level as well as current and anticipated non-governmental assistance from nonprofits or faith-based groups and establish lines of communication for preventing DOB.

To analyze DOB, the LEA will complete the following steps:

1. Assess Need: Determine the amount of need (total cost);
2. Determine Assistance: Determine the amount of assistance that has or will be provided from all sources to pay for the cost;
3. Calculate Unmet Need: Determine the amount of assistance already provided compared to the need to determine the maximum award (unmet need); and
4. Document Analysis: Document calculation and maintain adequate documentation justifying determination of maximum award.

In DOB calculations, private loans are not considered a form of assistance and will not be considered when calculating DOB. However, subsidized loans from the Small Business Administration or Federal Emergency Management Agency will be included in the DOB analysis unless one of the three exceptions below is met:

1. Short-term subsidized loans (e.g. bridge loans) for costs later reimbursed with Federal funds;
2. Declined or cancelled subsidized loans; or
3. Loan assistance used toward a loss suffered as a result of a major disaster or emergency.

Adopted:



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Contracts for Goods or Services Funded by
Federal Grants

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[See **POLICY ALERT Nos. 192, 224, and 230**]

6311 CONTRACTS FOR GOODS OR SERVICES FUNDED BY FEDERAL GRANTS

Any vendor providing goods or services to the school district to be funded by a Federal grant must be cleared for contract in accordance with the provisions of the Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (UGG), 2 CFR §200.213 – Suspension and Debarment.

The School Business Administrator/Board Secretary shall be responsible to check the web-based System for Award Management (SAM), accessible at www.sam.gov maintained by the United States government – the General Services Administration (GSA). The purpose of the SAM is to provide a single comprehensive list of individuals and firms excluded by Federal government agencies from receiving Federal contracts or Federally approved contracts or Federally approved subcontracts and from certain types of Federal financial and nonfinancial assistance and benefits.

The School Business Administrator/Board Secretary, upon opening of bids or upon receipt of proposals for goods or services to be funded by a Federal grant shall access the SAM to determine if the vendor has been disbarred, suspended, or proposed for disbarment. The School Business Administrator/Board Secretary shall also access the SAM list immediately prior to the award of a bid or contract to ensure that no award is made to a vendor on the list.

In the event a vendor under consideration to be awarded a bid or contract for goods or services to be funded by a Federal grant is on the SAM list or proposed for disbarment, the School Business Administrator/Board Secretary shall comply with the contracting restrictions as outlined in 2 CFR §200.

Continuation of current contracts and restrictions on subcontracting with vendors who are on the SAM list or proposed for disbarment shall be in accordance with the limitations as outlined in 2 CFR §200.



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Any rejection of a bid or disqualification of a vendor who has been disbarred, suspended, or proposed for disbarment shall be consistent with the requirements as outlined in N.J.S.A. 18A:18A – Public School Contracts Law and all applicable State laws.

The applicability of the provisions of this Policy apply to covered transactions as defined in 2 CFR §3485.220. A covered transaction is any contract that is awarded by the Board of Education that is covered under 2 CFR §180.210 and the amount of the contract is expected to equal or exceed \$25,000, unless the Board chooses a lower threshold.

Compliance with the provisions of 2 CFR §200 and this Policy must be demonstrated by written evidence to be maintained by the School Business Administrator/Board Secretary. Examples of evidence include printouts of searches from the SAM, imprints from an ink stamp, or Avery or similar labels affixed to purchase orders memorializing performance of this verification.

2 CFR §200

2 CFR §3485.220

2 CFR §180.210

Adopted:



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School District Security
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[See POLICY ALERT Nos. 214, 217, 218, 221, and 230]

7440 SCHOOL DISTRICT SECURITY

The Board of Education believes the buildings and facilities of the school district represent a substantial community investment. The Board directs the development and implementation of a plan for school district security to protect the school community's investment in the school buildings and facilities. The Board will comply with the security measures required in N.J.S.A. 18A:7G-5.2 for new school construction and for existing school buildings.

The school district security program will include: maintenance of facilities that are secure against unwelcome intrusion; protection against fire hazards and faulty equipment; and compliance with safe practices in the use of electrical, plumbing, heating, and other school building equipment.

As used in this Policy and N.J.S.A. 18A:41-7.1, "critical incident mapping data" means information provided in electronic or digital form to assist first responders in an emergency including, but not limited to: aerial images of schools; floor plans, including room and suite numbers; building access points; locations of hazardous materials and utility shut-offs; and any other relevant location information.

The Board shall provide to local law enforcement authorities **critical incident mapping data** ~~a copy of the current blueprints and maps~~ for all schools and school grounds ~~within the school district or nonpublic school~~. In the case of a school building located in a municipality in which there is no municipal police department, **critical incident mapping data** ~~a copy of the blueprints and maps~~ shall be provided to an entity designated by the Superintendent of the New Jersey State Police. The Board shall provide revised **mapping data** ~~copies~~ to the applicable law enforcement authorities or designated entities any time that there is a change to the **critical incident mapping data** ~~blueprints or maps~~.

Critical incident mapping data provided pursuant to N.J.S.A. 18A:41-7.1.a. shall be: compatible with all platforms and applications used by local, State, and Federal law enforcement authorities; provided in a printable format; and verified for accuracy through an annual walkthrough of school buildings and school grounds.



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School District Security

Nothing in this Policy or N.J.S.A. 18A:41-7.1 shall be construed to require local law enforcement authorities or designated entities to access critical incident mapping data using third party viewing software.

The Board directs close cooperation of district officials with law enforcement, fire officials, and other emergency agencies.

Each public elementary and secondary school building shall be equipped with at least one panic alarm for use in a school security emergency pursuant to N.J.S.A. 18A:41-10 through 13 **and this Policy and Regulation 7440.**

The Superintendent of Schools shall designate a school administrator, or a school employee with expertise in school safety and security, as a School Safety Specialist for the district in accordance with the provisions of N.J.S.A. 18A:17-43.3 **and this Policy and Regulation 7440.** The School Safety Specialist shall be required to acquire a New Jersey Department of Education School Safety Specialist certification in accordance with the provisions of N.J.S.A. 18A:17-43.2 **and this Policy and Regulation 7440.** The School Safety Specialist shall also serve as the school district's liaison with local law enforcement and national, State, and community agencies and organizations in matters of school safety and security.

Access to school buildings and grounds outside the hours school is in session shall be limited to personnel whose employment requires their presence in the facility. An adequate key control system will be established to limit building access to authorized personnel and guard against the potential of intrusion by unauthorized persons who have obtained access improperly.

In accordance with N.J.S.A. 18A:7G-5.2.b.(15), propping open doors to buildings on school grounds is strictly prohibited and students and staff shall not open a door for any individual. All persons seeking entry into the ~~main~~ building shall be directed to the main entrance.

Building records and funds shall be kept in a safe place and secured as appropriate and necessary.

Protective devices designed to be used as safeguards against illegal entry and vandalism may be installed when appropriate. The Board may approve the employment of school resource officers, school security officers, and/or law enforcement officers in situations in which special risks are involved.



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School District Security

The school district shall annually conduct a school safety audit for each school building in accordance with the provisions of N.J.S.A. 18A:41-14.

N.J.S.A. 18A:7G-5.2; 18A:17-43.1; 18A:17-43.2; 18A:17-43.3;
18A:41-7.1; 18A:41-10; 18A:41-11; 18A:41-12;
18A:41-13; 18A:41-14
N.J.A.C. 6A:16-1.3; 6A:26-1.2

Adopted:



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Citizens Advisory Committees
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[See POLICY ALERT No. 230]

9140 CITIZENS ADVISORY COMMITTEES

The **Board of Education encourages** ~~success of the school system depends, to a large extent, on open channels of communication between the school district community and the community at large. Citizens advisory committees may be~~ **are particularly** useful in keeping the Board of Education and the administration informed with regard to community opinion and in representing the community ~~in the study of specific school problems.~~

The Board may establish **a citizens** advisory committees ~~as standing committees to serve in a liaison function to provide input to the Board and the administration from~~ between the local community and the schools, as permanent ~~committees~~ for funded programs as the law requires; and as the **Board sees fit** need arises.

In creating a new **citizens** advisory committee, the Board ~~may shall~~ appoint: members of the community who are able and interested in the subject and concerned about the schools; ~~appoint~~ members who represent a wide range of community interests and backgrounds; ~~appoint~~ a chairperson; ~~and appoint~~ one or more Board members; and **school staff members** ~~to serve as ex-officio members.~~ **The Board President or designee and the Superintendent or designee shall serve as members of the citizens advisory committee.**

In charging a new **citizens** advisory committee, the Board shall define the **citizens advisory** committee assignment in writing, set a date for a ~~preliminary and final report(s) to the Board,~~ and establish a budget, **if needed**. Expenditures of district funds by **a citizens** advisory committees ~~as standing committees to serve advisory committees~~ shall be made ~~only~~ upon the approval of the **Superintendent**

Recommendations of ~~an~~ **citizens** advisory committee shall not reduce the responsibility of the Board, which may accept, ~~or~~ reject, **or modify a citizens advisory committee's** recommendation(s) in the exercise of its statutory discretion.



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Citizens Advisory Committees

Meetings of an **citizens** advisory committee that are ~~open to or~~ attended by fewer than a majority of the members of the Board are not subject to the Open Public Meetings Act

Choose only one of the following:

___ but shall

___ and need not

be open to the public, except as expressly permitted by the Board.

~~N.J.A.C. 6:30-1.5; 6:31-1.14(b)~~
~~20 U.S.C.A. 3801 et seq.~~

~~Cross reference: Policy Guide Nos. 5520, 7440~~

Adopted:

