



**2024-2025 ECTOR  
COUNTY ISD GRANT  
ADMINISTRATIVE  
PROCESSES AND  
PROCEDURES MANUAL**

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## Introduction

The ECTOR COUNTY ISD GRANT ADMINISTRATIVE PROCESSES AND PROCEDURES MANUAL includes the internal controls and grant management standards used by Ector County Independent School District to ensure that all external revenue funds are lawfully expended. The Grants Manual specifies procedures related to the acquiring, expending, managing, and reporting of grant funds, including grants submitted by all departments both competitive and entitlement grants. While some grants are submitted through the Development Office and others are submitted through various departments, all grants submitted through ECISD must follow the procedures outlined herein. The district has established fiscal procedures that apply to all financial transactions that relate to federal, state and local grant compliance in response to the policies and procedures set forth by federal, state and local regulations.

The guidelines herein shall be used as standard operating procedures for all grants awarded to ECISD and shall be reviewed annually by the Chief Financial Officer, or sooner as appropriate- should federal, state or local changes in regulations or policy warrant immediate changes.

All ECISD employees who receive and/or manage grant funds are expected to review this manual, gain familiarity and understanding of the District's rules and practices in order to ensure compliance with all requirements. Additionally, all grant managers must attend grant manager training.

## Purpose

It is the goal of the Ector County Independent School District (ECISD) to follow uniform guidance in support of all federal regulations through EDGAR (Education Department General Administrative Regulations) 34 C.F.R. Part 75 and Part 200, state regulations, and local policy in the administration of federal, state, local and privately funded grants with the dual purpose of supporting grant objectives for qualifying ECISD students, departments and staff in each grant program as well as to prevent the misuse, fraud and waste of grant monies.

All ECISD staff members shall comply with the:

- Employee Standards of Conduct: DH (Legal): [Link to Employee Standards of Conduct- DH \(Legal\)](#)
- Fiscal Management Goals and Objectives: Financial Ethics: CAA (Local)  
[Link to Fiscal Management Goals and Objectives- Financial Ethics CAA \(Local\)](#)

Should anyone suspect fraud or misuse of federal, state or general fund dollars, ECISD requires that the individual report suspected fraudulent activities in accordance with the ECISD Fraud Policy reporting fraud directly to the superintendent, his designee, or internal audit or to the fraud hotline 1-844-600-0087 or 1-800-216-1288 in Spanish.

## Effective Date

The Uniform Guidance (2 CFR Part 200), incorporated into EDGAR, went into effect on December 26, 2014, applying to federal education programs no later than July 1, 2015. On August 13, 2020, the Uniform Guidance was revised and these policies and procedures reflect those updates. Updates coming March 2025.

## Monitoring for Compliance and Consequences for Non-compliance

The District is responsible for complying with all requirements of each federal award (2 CFR 200.300(b)). Compliance with these policies and procedures is monitored by the District. (CBB (Legal) CH (Legal)). Failure of a district employee to comply with any of these requirements may result in disciplinary action, up to and including being liable to prosecution under the Texas Penal Code, Chapter 39, Abuse of Office.

The federal programs covered in this manual include the following:

- Federal Entitlement Grant Programs
- Federal Competitive Grant Programs from all agencies

The state funded programs covered in this manual include the following:

- State Compensatory Education
- State Competitive Grant Programs from all agencies

The private grants covered in this manual include the following:

- Corporate (offered by businesses)
- Private Foundations
- Local Agencies

All competitive grants including federal, state, local, corporate and foundation grants must follow all applicable polices. Please note, certain grants may flow through other agencies so it is important to ensure that applicable regulations from the original source of funding are followed.

## Definitions

**Confirming-** An unauthorized purchase. Securing services or goods without following appropriate procurement procedures through having received a purchase order through the purchasing department prior to securing the services or goods. (CH Regulation) Anyone creating or authorizing a purchasing commitment prior to approval may be liable to prosecution under the Texas Penal Code, Chapter 39, Abuse of Office, Section 39.01: [Texas Penal Code, Chapter 39- Section 39.01 \(Abuse of Office\)](#)

**Conflict of Interest-** any circumstance that could cast doubt on an employee's ability to act with total objectivity with regard to the District's interest

**Donation** – Same as a gift. Please note that all donations must be recorded on the [ECISD Donation form](#) and sent to the Development office for signature and submission to the Chief Financial Officer.

**Equal Consideration:** Giving equal consideration to various entities providing a supply or service. District employees shall grant all competitive suppliers' equal consideration insofar as state or federal laws and District policy permit. This is especially important when evaluating bids and proposals.

**Financial Interest:** District employees shall not participate directly or indirectly in procurement when the employee or the employee's family member has a financial interest in the procurement.

**Fiscal Agent** – Person or persons responsible for ensuring compliance with IRS regulations, as well as federal, state, and general fund requirements for monetary expenditures.

**GAN** – Grant Award Notification, an official document certifying the amount and other key terms of federal grants

**Gift** – A gift is an award given without stipulations that does not need to be repaid. In general, gifts and donations have few or no performance requirements. District employees shall not solicit, accept, or agree to accept any gifts or benefits from a person conducting or intending to conduct business with the District.

**Note:** The prohibition of accepting gifts does not apply to accepting an **unsolicited** item with a value of less \$75, excluding cash or a negotiable instrument (Penal Code 36.10).

**Grant** – An award of monetary assistance, usually tied to a very specific purpose or program plan

**Grant Director/Principal** – Department or school with rights to request grant expenditures for purchasing approval

**Independent Contractor** – The payer has the right to control or direct only the result of the work and not what will be done and how it will be done

**NOGA** – Notification of Grant Award from a state or federal agency (see GAN, above)

**Obligated-** Time that a contract is signed, or services have been provided

**Period of Availability-** The beginning date and ending date of a grant award

**Personal Use-** Using an item purchased by the district for one’s own gain outside of the scope of duties as assigned. District employees shall not make any commitment to acquire goods or services in the name of the District for personal use or ownership.

**Procurement-** Process of expending funds for services and materials

**Project Manager/Coordinator** – Person assigned to handle the day-to-day implementation of a grant project. Specific responsibilities vary by grant, but in general Project Manager/Coordinators are responsible for grant implementation and reporting in accordance with grant requirements.

**Recipient-** An entity that receives a Federal award directly from a Federal agency to carry out an activity under a Federal program. The term recipient does not include subrecipients or individuals that are participants or beneficiaries of the award.

**Subrecipient-** An entity that receives a subaward from a pass-through entity to carry out part of a Federal award. The term subrecipient does not include a beneficiary or participant. A subrecipient may also be a recipient of other Federal awards directly from a Federal agency

Additional acronyms and definitions related to federal grant management are listed in:

[National Archives- Code of Federal Regulations Definitions](#)

## Standards for Financial and Program Management

ECISD will maintain federal & state entitlement awards, competitive awards, and in-kind awards in a manner so as to ensure the grant funding is expended in full accordance with U.S. statutory and public

policy requirements to include those protecting public welfare, the environment and prohibit discrimination as well as to honor the requirements imposed by competitive awards.

## Federal, State & Local Policies and Regulations

This manual sets forth the internal control procedures used by Ector County ISD to administer federal competitive and entitlement grant funds pursuant to the following:

[CFR Part 200-Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards](#)

## Title 2- Code of Federal Regulations:

Title 2 Code	ECISD Practice
§200.214 Suspension and debarment	Ector County ISD Purchasing Department will ensure that prior to entering into a covered transaction with another person, or business has not been excluded or disqualified in accordance to §200.214 by taking the following actions when setting up vendors for business: <ul style="list-style-type: none"> <li>(a) Checking SAM Exclusions; or</li> <li>(b) Collecting a certification from that person; or</li> <li>(c) Adding a clause or condition to the covered transaction with that person.</li> </ul>
§200.303 Internal Controls	In compliance with this section of EDGAR, ECISD will: Establish and maintain effective internal control over all Federal awards that provide reasonable assurance that the recipient or subrecipient is managing all Federal awards in compliance with Federal statutes, regulations, and the terms and conditions of the Federal awards.

<p>§200.305 Federal Cash Management Policy and Procedure</p>	<p>Ector County Independent School District (ECISD) will comply with applicable methods and procedures for payment that minimize the time elapsing between the transfer of funds and disbursement by ECISD, in accordance with the Cash Management Improvement Act. Generally, ECISD receives payment from the Texas Education Agency (TEA) on a reimbursement basis; however, if ECISD receives an advance in federal grant funds, ECISD will remit interest earned on the advanced payment quarterly to the federal agency. ECISD may retain interest amounts up to \$500 per year for administrative expenses. 2 CFR § 200.305(b) (9).</p> <p>According to guidance from the U.S. Department of Education (ED), when calculating the interest earned on ED grant funds, regardless of the date of obligation, interest is calculated from the date that the federal funds are drawn down from the G6 system until the date on which those funds are disbursed by the local educational agency (LEA). Interest would not accrue if the LEA uses non-federal funds to pay the vendor and/or employees prior to the funds being drawn down from the G6 system, commonly known as a reimbursement.</p>
<p>§ 200.308 Revision of Budget and Program Plans</p>	<p>ECISD will report deviations from budget or project scope or objective and request prior approvals from specific grant programs as specified by each awarding grant agency's guidelines. Campus administration, program directors or executive directors, human resources, finance, payroll, and chief financial officer in a collaborative effort will:</p> <ol style="list-style-type: none"> <li>1. Ensure that the applicable program executive director and/or senior leadership assigned to the grant program has approved the budget change in accordance with District Regulation CE.</li> <li>2. Ensure that the budget change or amendment does not exceed 25 percent of the total grand budget unless approved by the applicable funding agency.</li> <li>3. Ensure that the budget change or amendment does not result in an increase or decrease in the number or composition of the positions in accordance with the funding agency.</li> <li>4. Ensure that the budget change or amendment does not result in the classification of an amount not previously budgeted unless approved by the applicable funding agency.</li> </ol>



	<p>5. Ensure that the budget change or amendment does not result in an increase or decrease in budgeted capital outlays unless approved by the applicable funding agency.</p>
<p>§200.313 Equipment</p>	<p>In accordance with 2 CFR § 200.313, ECISD will ensure equipment purchased with federal funds:</p> <ol style="list-style-type: none"> <li>(1) Will be used for the authorized purposes of the project during the period of performance, or until the property is no longer needed for the purposes of the project.</li> <li>(2) Will not encumber the property without approval of the federal awarding agency or pass-through entity.</li> <li>(3) Use and dispose of the property without approval of the federal awarding agency or pass-through entity. <ul style="list-style-type: none"> <li>(b) A state must use, manage, and dispose of equipment acquired under a Federal award by the state in accordance with state laws and procedures.</li> </ul> </li> <li>(4) Follow ECISD Asset Management Guidelines.</li> </ol> <p><b>New Assets over \$500.00:</b> The purchase of fixed assets with an individual cost of \$500 or more will be tagged with the school district's name and asset number assigned to that asset at Central Receiving, upon receipt and added to your school/department's fixed asset inventory report. Campus and department principals and supervisors are responsible for maintaining their inventory in accordance with CFB Regulation section "Campus/Department Asset Management". All fixed assets are maintained within the School District's accounting software with purchase date, description, cost, asset tag number, useful life and disposition information.</p>
<p>2 CFR § 200.313 &amp; § 200.314 Equipment Disposition</p>	<p>In accordance with 2 CFR 200.313 and 200.314, complete and submit the form: Division of Grant Administration: Inventory Disposition Request to request approval to dispose of equipment or supplies and materials purchased with federal grant funds.</p> <p>Forms can be found with the applicable grant guidance: <a href="#">EDGAR Materials and Resources</a></p>
<p>§200.322 Domestic Preferences for Procurement</p>	<p>To the greatest extent practicable, ECISD will provide a preference for purchases of goods and materials produced in the United States. This preference will be included in all subawards, contracts, and purchase orders.</p>

§200.324 Contract cost and price	A cost price analysis for purchases over \$250,000 (Simplified acquisition threshold) in aggregate will be performed annually by the Purchasing department to ensure competition.
§200.326 Contract Provisions	ECISD will follow the applicable provisions described in Appendix II to Part 200—Contract Provisions for Recipient or Subrecipient Contracts under Federal Awards.
2 CFR Part §3485.330	<p><b>Prior to doing business with a person or business, Ector County Purchasing Department will require vendor to:</b></p> <p>(1) Comply with this subpart as a condition of participation in the transaction. You must do so using the method specified in paragraph (b) of this section; and</p> <p>(2) Pass the requirement to comply with this subpart to each person with whom the participant enters into a covered transaction at the next lower tier.</p> <p>b) To communicate the requirements in this part to a participant, you must include a term or condition in the transaction that requires the participant's compliance with part 180, subpart C, of this title, as adopted at §3485.12, and requires the participant to include a similar term or condition in lower-tier covered transactions.</p> <p>(c) The failure of a participant to include a requirement to comply with Subpart C of 2 CFR part 180 in the agreement with a lower tier participant does not affect the lower tier participant's responsibilities under this part.</p>

## Education Department General Administrative Regulations (EDGAR):

The USDE adopted the uniform grant guidance in 2 CFR Part 200 as its regulations in 2 CFR Part 3474 (with two minor exceptions), which gives regulatory effect to the Office of Management and Budget (OMB) guidance in 2 CFR Part 200. Updates coming March 2025. As of December 26, 2014, EDGAR consists of:

[U.S. Department of Education- Education Department General Administrative Regulations and Other Applicable Grant Regulations](#)

EDGAR	Applicability
<a href="#">CFR- Direct Grant Programs</a>	Applies to grants awarded directly to the District by the USDE or by another federal awarding agency; also applies to subgrants awarded by TEA for a competitive grant that TEA applied for and received

<a href="#">CFR-State Administered Programs</a>	Applies to all formula grants administered by TEA and to all grants allocated to TEA based on a formula
<a href="#">CFR- Definitions That Apply to Department Regulations</a>	Applies to all federal education grants
<a href="#">CFR- General Education Provisions Act- Enforcement</a>	Applies to all federal education grants
<a href="#">CFR- New Restrictions on Lobbying</a>	All federal grants (government-wide)
<a href="#">CFR- Drug-Free Workplace Requirements</a>	Applies to all entities that receive grants directly from the USDE or from any other federal agency. It does not apply to LEAs that only receive funds through TEA or another pass-through agency.
<a href="#">CFR- Drug and Alcohol Abuse Prevention</a>	Applies to IHEs (i.e., colleges and universities) receiving federal funds directly from the USDE or any other federal agency
<a href="#">CFR- Protection of Human Subjects</a>	Applies to all research involving human subjects conducted, supported, or otherwise subject to regulation by the USDE or any other federal department or agency that makes it applicable. There are exemptions for certain educational activities.
<a href="#">CFR- Family Educational Rights and Privacy</a>	Applies to all entities receiving federal education funds
<a href="#">CFR- Part 200 Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards</a>	Applies to all new federal grants awarded as of December 26, 2014
<a href="#">CFR- Part 3474 Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards</a>	Applies to all federal education grants awarded as of December 26, 2014
<a href="#">CFR- Part 3485 Non-procurement Debarment and Suspension</a>	Applies to all entities that receive federal grants, subgrants, and subcontracts (government-wide)

## Additional Federal Grant Specific Compliance Requirements

### ESSA FISCAL COMPLIANCE

Local educational agencies (LEAs), including school districts and open-enrollment charter schools, must follow certain federal requirements when accepting federal funds. The federal requirements the LEA must follow under Every Student Succeeds Act (ESSA) include maintenance of effort (MOE) and comparability of services.

#### ESSA LEA Maintenance of Effort

MOE requires LEAs to maintain their state and general fund expenditures at a specified level from one fiscal year to the next. If your organization received a federal grant awarded under ESSA, you must comply with MOE requirements to receive your full allocation of federal grant funds for ESSA covered programs. ECISD uses the ESSA LEA MOE Calculation Tool to determine compliance with the MOE requirement.

### IDEA FISCAL COMPLIANCE

Local educational agencies (LEAs), including school districts and open-enrollment charter schools, must follow certain federal requirements when accepting federal funds. Under the Individuals with Disabilities Education Act of 2004, Part B (IDEA-B), the federal requirements the LEA must follow include maintenance of effort (MOE) and excess costs.

#### IDEA-B LEA Maintenance of Effort

MOE requires LEAs to maintain their state and general fund expenditures at a specified level from one fiscal year to the next. LEAs must meet the MOE requirement to be eligible to receive IDEA-B grant funds. ECISD uses the IDEA-B LEA MOE Calculation Tool to determine compliance with the MOE requirement.

#### Excess Cost

The excess cost requirement mandates how much LEAs must expend in state and general funds on special education before being allowed to expend IDEA-B grant funds. ECISD uses the Excess Cost Calculation Tool to calculate excess cost.

## State Regulations

This manual sets forth the internal control procedures used by Ector County ISD to administer state competitive and entitlement grant funds pursuant to applicable Texas Education Code as provided in the Financial Accountability System Resource Guide, Update 18 for the following:

- The Texas School Law Bulletin (Primarily sections 44.031 through 44.033). An electronic version of the Texas State Education Code can be obtained at the following website address: [Texas Legislature Online](#)
- The Texas Education Agency (TEA) Financial Accountability System Resources Guide Purchasing Module. The TEA Resource Guide can be accessed at the following address:

### [TEA- Financial Accountability System Resources Guide](#)

to include:

- Module 1, Financial Accounting and Reporting: [TEA- Financial Accounting and Reporting](#)
- Module 4, Auditing: [TEA- Auditing](#)
- Module 5: Purchasing: [TEA- Purchasing](#)
- Module 6: State Compensatory Education, Guidelines, Financial Treatment and an Auditing and Reporting System: [TEA- State Compensatory Education, Guidelines, Financial Treatment, and an Auditing and Reporting System](#)

## Local Regulations

This manual sets forth the internal control procedures used by Ector County ISD to administer federal, state and private grant funds pursuant to applicable Local Board Policies:

- ECISD Online Board Policy Manual: [ECISD Board Policy Manual](#)
- Administrative Regulations: [ECISD Administrative Regulations](#)

CBB (Legal, Local & Regulation) State and Federal Revenue Sources

CE (Legal, Local & Regulation) State and Federal Revenue Sources

CH (Legal, Local & Regulation) Purchasing and Acquisition

CHE (Legal, Local & Regulation) Purchasing and Acquisition Vendor Disclosures and Contracts

CJ (Legal, Local & Regulation) Contracted Services

CJA (Legal, Local & Regulation) Contracted Services- Criminal History

CO (Legal, Local & Regulation) Food and Nutrition Management

COA (Legal, Local & Regulation) Food and Nutrition Management- Procurement

COA (Legal, Local & Regulation) Food and Nutrition Management- Free and Reduced-Price Meals

CQ (Legal, Local & Regulation) Technology Resources

CQA (Legal, Local & Regulation) Technology Resources: District, Campus and Classroom Websites

CQB (Legal, Local & Regulation) Technology Resources Cybersecurity

DEAA (Legal, Local & Regulation) Compensation Plan Incentives

## Grant Application Processes

### TEA Grants:

The majority of federal grants the District applies for and receives are formula grants administered by TEA (i.e., state-administered grants). The District may also apply for and receive discretionary grants from TEA or directly from the USDE or another federal awarding agency. The policies and procedures outlined in this document apply to all federal formula and discretionary grants, regardless of the awarding agency. Federal agencies that award direct grants may impose requirements or conditions that are not addressed herein and that may result in the need to create additional policies and/or procedures to comply with those requirements.

Refer to TEA's Grant Process for a description of their process for administering state and federal formula and discretionary grants. Also refer to TEA's description of Applying for a Grant for information on allocations, notices of grant funding opportunities, and the competitive review process.

### **Request for Application (RFA):**

TEA publishes a *Request for Application* (RFA) for each grant (formula and discretionary) and posts all grants on the [TEA Grant Opportunities](#) page. Some grants are available only in eGrants, while others are available only in paper. Applicants for eGrants must be approved for access to [TEA- Request Access Online \(TEASE\)](#) before applying for an eGrant.

The process an applicant must follow to apply for funds is different for eGrants than for paper applications. Applicants can find detailed information about individual grants by selecting a grant from the Application Name dropdown list on the [TEA Grant Opportunities](#) page. For each individual grant available, the following information is displayed:

**Program Information-** Briefly describes the program purpose, lists eligible applicants, and eligibility criteria

**Eligibility-** Describes organizations that are eligible to apply for the grant

**Statutory Authority-** Cites the legislation that authorizes the grant

**Funding Information-** Provides the start and ending date of the grant, whether it is state or federal, and the total amount that will be awarded

**Application and Support Information-** Lists links to components of the Request for Application (RFA) such as the General and Fiscal Guidelines, Program Guidelines, Application, and any other pertinent grant materials, such as the announcement letter and any issued errata notices

**Critical Events-** Lists all deadlines associated with the grant, including the application due date, amendment due date, and fiscal and programmatic reporting due dates

**Contact Information-** Lists the TEA program and fiscal contacts. The TEA Program Contact can provide information about eligibility, program purpose or description, or allowable uses of funds. The TEA Funding Contact can answer questions about the grant application, including allocation and amendment questions.

Each RFA published by TEA includes the [General and Fiscal Guidelines](#) that apply to all federal and state grants, the Program Guidelines (that apply to a specific grant program), and the [Provisions, and Assurances](#) that apply to all grants administered by TEA. District employees who manage the program or fiscal aspects of any TEA grant should consult the General and Fiscal Guidelines regularly and frequently, as they may change or be updated periodically.

All employees who deal with federal grants must also carefully review and be familiar with all [Guidelines, Provisions, and Assurances](#) as applicable:

- [Provisions and Assurances on or After January 04, 2021](#): Required for every TEA grant

- agreement
- [Provisions and Assurances before January 04, 2021](#) : Required for every TEA grant agreement
- [Debarment and Suspension](#): Required for all federal grants, regardless of dollar amount
- [Lobbying Certification](#): Required for all federal grants greater than \$100,000
- [Every Student Succeeds Act \(ESSA\)](#): Required for all programs funded under the Elementary and Secondary Education Act of 1965, as amended by Public Law 114-95, Every Student Succeeds Act (ESSA)

The RFA also includes the grant application (i.e., Standard Application System, or SAS) and the instructions for completing the SAS schedules (i.e., forms). Program managers preparing grant applications should carefully review all contents of the RFA package prior to planning and developing a grant application to ensure all requirements are met and the application is completed correctly. Some applications require advance coordination among district staff and/or among other entities such as local businesses, community organizations, or institutions of higher education (IHEs, i.e., colleges and universities).

### Submitting Complete Applications on Time

It is equally important that federal grant applications be prepared and submitted on time. For formula grants administered by TEA that usually begin July 1, the District cannot obligate funds and begin grant activities until the District submits the application to TEA in substantially approvable form. TEA will process the applications in the order received.

For competitive discretionary grants, it is the policy of the District that those applications be submitted in sufficient time for TEA to receive the application by the established deadline date and time specified in the competitive RFA. Failure for TEA to receive the application by the specified deadline date and time will render the application ineligible for consideration for review and scoring and for funding. In addition, all required forms must be completed in accordance with the instructions in the RFA in order to be eligible for consideration for funding. The program manager assigned to the grant is responsible for ensuring the application is completed accurately and submitted on time to TEA.

### Authorized Official

The person signing/certifying the application must be an authorized official of the District who will represent the District in the event of a legal dispute. The **Superintendent or Chief Financial Officer** serves as the authorized official for ECISD. By signing/certifying the application, the authorized official is certifying that he or she will comply with the terms and conditions of the grant, all applicable provisions and assurances, and the approved application. The signed/certified application submitted to TEA, and the NOGA issued by TEA, together constitute a legally binding contractual agreement between the District and TEA. No other employee of the school district has the authority to submit a grant application.

District program staff, fiscal staff, and management are responsible for knowing all requirements and for complying with them. It is the policy of the District that the grant program described in the application is carried out in compliance with applicable statutes, regulations, rules, and guidelines, and in accordance with the approved application to achieve maximum efficiency and effectiveness with the goal of providing an integrated, coordinated delivery of services for students. Grant funds will be obligated, expended, and accounted for in an environment based on ethical principles and sound business practices.

The District program manager assigned to the grant program is responsible and held accountable for knowing the program requirements, fiscal requirements, and reporting requirements. In addition to the policies and procedures outlined in this manual, the program manager may be required to develop additional policies and procedures in order to comply with the specific requirements that may apply to a particular grant program. Any such additional policies and procedures must be used in conjunction with the policies and procedures outlined in this manual.

### Other Federal Grants

The ECISD Development Office is responsible for monitoring grant opportunities. Approval from Cabinet to pursue the grant opportunity must be obtained in advance of completing and submitting the application. All ECISD employees planning to submit grant applications should contact the ECISD Development Office Grant Writer prior to preparing proposals.

The District shall provide public notice of federal grant applications by publishing information on the District’s website when required by the granting agency. The District shall make available opportunities for public input as required by law or the granting agency. An authorized official of the District (as previously described) must sign/certify the application prior to submission.

Opportunities for other federal grants passed through other state agencies might be published in the [Texas Register](#) in the “IN ADDITION” section. Opportunities for federal grants available directly from the USDE or from another federal awarding agency are published in [Grant.Gov](#).

### General Grant Application Procedures

Responsible Party		Action
Initiating Department	1.1	A grant can be initiated in three ways: 1. In response to an entitlement notification from the awarding agency. 2. In response to an identified need shared with the Development office. 3. In response to a campus/ department pursuing a grant opportunity that has been shared with the Development Office.
Reviewing Department	1.2	All grants are required to be approved prior to the pursuit of the grant opportunity. Entitlement grants will be prepared by the official leadership personnel assigned to the grant area. Competitive Grants will be submitted to the Development Office for pre-approval through Senior Leadership as appropriate. Staff seeking to apply for a grant <b>must complete</b> a Grant Writing Services Request Form- <a href="#">Grant Writing Services Request Form</a>
District Grant Writer	1.3	The district grant writer will review the grant funding form for administrative support and present it to the Director of Development who will seek senior leadership support. If approved, the grant writer <b>or</b> the campus/department staff will work to complete the grant application for funding. For guidance, see <a href="#">Flow Chart for Grants</a> and <a href="#">Grant Process</a> .



Authorized Signature	1.4	Upon completion of the grant application, the departmental leadership for entitlement grants, the grant writer, or campus/ department/ individual will obtain the “authorized signature” to submit the grant application. <b>The authorized signature for the district is one of the following:</b> The Superintendent of Schools The Chief Financial Officer
Initiating Department/ Development Office/ Leadership Personnel	1.5	A campus/department will be notified by the Development Office regarding approval or denial of the grant application for the competitive/in kind grants submitted on their behalf. If the campus/department is funded outside of the Development office, the campus/department <b>must</b> notify the Development office of their award.
Initiating Department/ Development Office/ Leadership Personnel	1.6	If the grant is approved, a GAN/NOGA will be received from the awarding agency to the individual listed as being responsible for administering the grant, the superintendent and/or the authorized official.
Initiating Department/ Leadership Personnel	1.7	It is the responsibility of the initiating department/ or leadership personnel assigned to manage the grant to work with Finance and Accounting to get the budget established.
Initiating Department/ Leadership Personnel	1.8	It is the responsibility of the initiating department/ or leadership personnel assigned to manage the grant to attend grant administration training through the federal/state programs office and ensure that all federal/state/general fund guidelines are followed while spending the funds in accordance with the submitted/ awarded plan.

## Grant Preparation Procedures (Entitlement Grants)

### ESSA Funds

ESSA Title grant programs needs will be supported through campus and district comprehensive needs assessment and continuous improvement plans, consideration of stakeholder input as well as receiving prior approval in the grant application for funding.

### ESSER ARP Funds

ESSER ARP grant funds will continue to follow stakeholder input, support activities in our strategic plan, follow approved activities from the grant application, and be supported and reviewed by individual request through C&I and the Superintendent.

### State Compensatory Funds

State Compensatory Education programs will be supported through comprehensive needs assessment and district/ campus plans.

### State CTE Funds

State CTE needs will rest on Goals for Expenditures, Program Elements, Current Year Program Guidelines.

## Carl D. Perkins Career & Technology Funds

The purpose of the program is to develop more academic and career and technical skills of secondary education students who elect to enroll in CTE programs. ECISD must demonstrate that they are fulfilling the following nine requirements with Perkins funds or a combination of Perkins and other funds:

- Integrate academics with CTE programs using a coherent sequence of courses.
- Link CTE at the secondary and postsecondary levels.
- Provide students with strong experience in and understanding of all aspects of an industry.
- Develop, improve, or expand the use of technology in CTE programs.
- Provide professional development programs to teachers, faculty, administrators, and career guidance and academic counselors who are involved in integrating CTE programs.
- Develop and implement evaluations of the CTE programs carried out with funds, including an assessment of how the needs of special populations are being met.
- Initiate, improve, expand, and modernize CTE programs, including relevant technology.
- Provide services and activities that are of sufficient size, scope, and quality to be effective.
- Provide activities to prepare special populations for high-skill, high-wage, or high-demand occupations that will lead to self-sufficiency.

All federally funded entitlement programs will follow established guidelines in accordance to the federally funded grant program and the approved applications for funding as outlined by EDGAR, policy guidance, general provisions of selected items of cost, allowable and allocable in accordance with grant specifications as well as state and local policies.

## Foundation Grants

Private Foundations are organizations that are established for charitable purposes, often by a family, individual or corporation. They fund non-profit organizations and sometimes public-school districts and other government agencies. Private foundations often have geographical limits related to the area where the corporation operates and/ or where the benefactors live or once lived. Some foundations fund a wide variety of activities, while others are focused more narrowly on just a few areas of interest. Foundations may accept proposals or applications on a rolling basis, although many of them have specific grant cycles with deadlines. Foundations are governed by a board of directors and often have staff members who process grants as well. Some foundations have a formal application process, while others have a short informal process (possibly as simple as a letter of inquiry). Many foundations have moved to an online application process, using grant software or web-based forms. Some foundation grants are emailed to the funders, while some still require mail in application. Foundation grants should be submitted to the Development Office on a grant assistance form prior to submission to the funder. [Grant Assistance Form](#).

## Inquires to Private Foundations

In ECISD, prior to approaching a private or corporate foundation, employees should contact the Development Office Grant Writer to ensure that another department or school is not already in contact with that funder for another project. Most of the time funders prefer to be approached only once a year or less often by the same organization. Often, the best approach for an initial contact is a phone call or online meeting to discuss funding the desired project with the foundation staff. They will likely be able to

clarify if the proposed project is a good match for their foundation. As you meet with staff members, be sure to note details they provide in the meeting or call. Generally, they are pretty honest if they feel the project would not likely be funded and that can be helpful, so that efforts can be focused on funders that are more likely to provide money for the project.

## Types of Foundation Grants

Foundations fund various types of grants, and not all foundations fund each kind of grant. Foundations may fund operational expenses, projects, capital, events and/or programs. Operating expenses, when funded, are typically awarded to non-profit organizations and may be less likely to be awarded to schools. Projects are activities that have a specific purpose and usually foundations will ask for the expected outcomes of a project prior to funding. Grants for capital funding are used for items that will typically be used for many years to come, like property, equipment, land, computers, furniture, software, buildings, construction and playgrounds. Events or “one-time funding” are for a specific activity, usually in short duration. Grants for events may actually qualify as a donation, rather than a grant. In these cases, the application may be simpler and you may have a quicker response time. Program grants are similar to project grants and generally fund an ongoing program of some sort that has specific activities and outcomes. Formal applications for ongoing programs often take more time and frequently require financial data from the organization, such as annual budgets, audits and other data. Often student data and/or school information will be required when writing a proposal for a foundation. When planning for a foundation grant, it is good to allow 4-6 months for an answer, although sometimes you will hear in less time.

## Pre Applications and Letters of Inquiry (LOI)

Foundations may require a pre application or letter of inquiry (LOI), which is used to determine if your project is of interest to the funder(s). Often the board of directors will vote on pre-applications and LOIs to determine which grants will move forward to a full application. Once a pre-application or LOI is approved for full proposal, you will be able to submit all of the required documents required for the full application for final consideration. Some foundations do not use this process and require the entire application at once, so be sure to note the required documents and timelines.

## Financial Management

Frequently, after receiving an application, foundations request a site visit. This is a good sign, as it indicates there is still interest in your project. A site visit is where foundation staff come to the place where the grant activities are planned and take a look around to see the facilities. They may require a formal presentation and/or they may have a list of questions for you to answer. Be prepared! They often ask financial questions about the organization, so be sure you can answer basic questions about your school, finances and other topics related to your project. It is good to have several people available when the site visit is scheduled, so that different questions may be answered by those best prepared to respond. A site visit is usually an hour or less and may be done in person or virtually, depending on circumstances. It is nice if you can serve refreshments and have brochures or other information about the project ready for the foundation staff. The site visit is a time for showcasing the work related to the grant and highlighting the benefits of the potential project. Make sure the staff understand the project and have a good grasp of what you actually are doing and/or are planning to do. The board of directors relies heavily

on the staff for information, so be sure staff are clear on the details, as they will likely present your grant to the foundation board at their meeting.

## Funding Decisions & Challenge Grants

Foundation funding decisions, while they may be influenced by foundation staff, are usually made by a board of directors. The board will generally determine which projects are funded, how much the recipients or subrecipients will be awarded and if there will be any challenge grants. A challenge grant is when the board of directors requires you to raise a certain amount of money to match the funds they award. This generally means the additional funds have to be raised before you can receive the foundation's funding. The board may put certain requirements in place for your project, which will be contained in the grant award letter or contract.

## Foundations and Post-Award Requirements for ECISD

When a foundation grant is funded, the author's supervisor, the Development Office and the CFO at ECISD should be notified. An ECISD donation form is required for foundation grants and submitted for approval to the Director of the Development Office, who will sign and forward it to the CFO. [Donation Form Instructions and Link](#). Next, the CFO will approve the donation and ask Accounting to have an account set up for the grant. If the grant is over \$10,000, school board approval will be necessary. Once all approvals are in place, the grant account can be set up and the budget can be loaded. Accounting staff will need a copy of the donation form and a budget so they can set up the account with appropriate budget categories. Grant manager will be required to attend "Post Award Training" given by Development Office and Federal and State. It is important to work with Accounting, Purchasing and other departments affected by your grant throughout the period of funding.

## Post Award Requirements for Foundations

Communication with the foundation is key, once the grant is funded. Start with a formal letter of appreciation as soon as the notice of award is received. Most foundations require signatures on a contract or award letter. This requirement will likely be communicated with you as soon as you are notified of funding. Be sure to submit all contracts and agreements by the deadlines or your grant could be rescinded. Foundations may want to hear from you throughout the funding period and it is a good idea to check in once in a while and, when possible, send pictures of some of your activities. Most foundations require reports, so be sure to submit the reports in a timely manner. Reports may be required annually, semiannually and/or at the end of the grant period. Usually, additional funding will not be approved until required reports are received. If you are interested in further funding from the foundation, it is a good idea to begin discussions of any new projects toward the end of the funding period. Remember to follow the cycles and timelines when submitting new proposals.

## Corporate Grants

Companies and corporations may have foundations to which you can apply for funding. In some cases, these foundations operate much the same as private foundations; however, they may have slightly different procedures and requirements. Some corporations award donations and grants that require fewer formal submissions. In this case the donation may be for an event or a specific type of support. Sometimes, an online form is used and may take only a short time to complete. Corporate sponsorships

are another source of funding and may be obtained for specific activities as well. Sponsorships and some corporate grants and donations will require formal, public and even ongoing recognition of the funder. Press releases, use of the company logo on your website, social media and other recognitions may be expected. Be sure that any corporate requirements are approved by the appropriate administrator at ECISD prior to committing to the recognition.

## School Nutrition Program

In accordance with the Texas Department of Agriculture Administrative Procedures Manual for School Nutrition Programs, if there is a regulatory conflict, ECISD will follow the USDA regulations for Child Nutrition Program funds in regards to income, allowable and unallowable costs, and procurement. School Nutrition micro-purchases will follow TDA policy in which aggregate is defined as the total amount of a single invoice for a single purchase.

In conjunction with federal guidance outlined by the Texas Department of Agriculture (TDA), Food Services will follow the TDA Food and Nutrition Guidelines in the administration of its program as outlined in the Administrator's Reference Manual, released by the Texas Department of Agriculture, Food and Nutrition Division; 1700 North Congress Ave, Suite 1125 E, Austin, Texas 78701-1496 as updated. Link to manual: [Administrator's Reference Manual \(ARM\)](#)

## Grant Preparation Procedures (Competitive Grants)

All grants should be pursued based on identified needs as well aligned to the ECISD Strategic Plan: [Strategic Plan 2019-2024](#) and aligned to the current year ECISD District Improvement Plan: 2024-2025 District Improvement Plan.

When pursuing grant opportunities, follow these steps:-

- 1) Review the ECISD Strategic Plan and District Improvement plan to align your needs to the district's focused plans.
- 2) Gain immediate supervisor support for seeking the grant opportunity.
- 3) Your supervisor should ensure that the Cabinet level supervisor is supportive of your request as well as any other departments and their supervisors who may be involved in the request.
- 4) Once support is gained, complete the "Request for Grant Writing Assistance Form" on the ECISD Development Office site: [Grant Writing Services Request Form](#). All ECISD staff **must** go through the Development office to ensure ECISD processes and procedures are met- whether you are seeking assistance or not.
- 5) Work with the ECISD Development Office throughout grant preparation, and funding received to ensure that you have established budgets and are aware of your programmatic responsibilities outlined in the grant.
- 6) Complete Federal/ State Grant Implementation training through the Federal/ State Program's office.

- 7) Establish a budget for awarded funds and spend according to the purpose of your awarded grant application following all aforementioned policies.

## Financial Management

ECISD will follow local, state and federal guidelines as previously established in this manual.

## Budget Development and Ongoing Fiscal Compliance Review Calendar (Federal & State Entitlement Grants)

Each federal & state entitlement program will follow the guidance as specified within its federal and state program guidance unless otherwise specified below for budget development and monitoring.

Quarter: Month	Activities
<p><b>Quarter 1: July-September</b></p> <p><b>Cont./ Quarter 1: July-September</b></p>	<ul style="list-style-type: none"> <li>● Submit program evaluation of secondary exit level state compensatory effectiveness reviews to supervisor for Board review</li> <li>● Submit all federal program compliance reports in accordance to established due dates by TEA aligned to 2 C.F.R. 200.302.b.2: <ul style="list-style-type: none"> <li>○ Accurate, current and complete disclosure of the financial results of each federal program</li> <li>○ Maintain records that identify adequately the resources and application of funds for federally-funded activities.</li> </ul> </li> <li>● Release job descriptions for signature per grant</li> <li>● Collect monthly time and effort reports</li> <li>● Process part time and extra duty payroll</li> <li>● Monitor grant programs for spending alignment to allowable program activities per grant, campus and district plans (Quarter 1 Review)</li> <li>● Review campus and district needs assessment and district/ campus continuous improvement plans for services specified in grant applications &amp; evaluate campus needs. (Quarter 1 Review)</li> <li>● Attend Federal/State Grant Implementation training through the Fed/State Office for new awardees.</li> </ul>
<p><b>Quarter 2: October-December</b></p>	<ul style="list-style-type: none"> <li>● Ongoing review of grant awards</li> <li>● Ensure accounts are established in accordance to grant guidelines</li> <li>● Ensure each ESSA account is established in accordance with 2 C.F.R 200.302. b.1 to include the following: <ul style="list-style-type: none"> <li>○ Identification of all federal accounts received and expended under each federal program to include the CFDA title and number, federal award identification number, year and federal agency</li> </ul> </li> </ul> <p>Program intent codes for Special Education (23 or 33), Career &amp; Technology (22), Gifted &amp; Talented (21 or 31), Compensatory Education (24, 28, 30, or 34), and Bilingual (25 or 35) will be budgeted by the respective department.</p> <ul style="list-style-type: none"> <li>● Release semi-annual certifications, substitute systems of time and effort and stipend agreements for first semester</li> <li>● Review Semester 1 job descriptions for any late hires, release and obtain job descriptions</li> </ul>

	<ul style="list-style-type: none"> <li>● Collect monthly time and effort reports</li> <li>● Process part time and extra duty payroll</li> <li>● Monitor grant programs for spending alignment to allowable program activities per grant, campus and district plans (Quarter 2 Review)</li> <li>● Review campus and district needs assessment and district/ campus continuous improvement plans for services specified in grant applications &amp; evaluate campus needs. (Quarter 2 Review)</li> <li>● Pull snapshot data for preliminary Title One planning for upcoming school year</li> <li>● Attend Federal/State Grant Implementation training through the Fed/State Office for new awardees.</li> </ul>
<p><b>Quarter 3: January-March</b></p> <p><b>Cont./ Quarter 3: January- March</b></p>	<ul style="list-style-type: none"> <li>● Review and archive semi-annual certifications, substitute systems of time and effort and stipend agreements for first semester</li> <li>● Collect monthly time and effort reports</li> <li>● Process part time and extra duty payroll</li> <li>● Update budgets according to maximum entitlement for current year funding</li> <li>● Collect monthly time and effort reports</li> <li>● Process part time and extra duty payroll</li> <li>● Review Program Effectiveness Reviews for all title programs and state compensatory programs</li> <li>● Monitor grant programs for spending alignment to allowable program activities per grant, campus and district plans (Quarter 3 Review)</li> <li>● Review campus and district needs assessment and district/ campus continuous improvement plans for services specified in grant applications &amp; evaluate campus needs. (Quarter 3 Review)</li> <li>● Review snapshot data with senior leadership for determining campus participation in Title One for the upcoming school year</li> <li>● Attend Federal/State Grant Implementation training through the Fed/State Office for new awardees.</li> </ul>
<p><b>Quarter 4: April-June</b></p>	<ul style="list-style-type: none"> <li>● Release semi-annual certifications, substitute systems of time and effort and stipend agreements for first semester</li> <li>● Review Semester 1 job descriptions for any late hires, release and obtain job descriptions</li> <li>● Collect monthly time and effort reports</li> <li>● Process part time and extra duty payroll</li> <li>● Work with current year district improvement teams, Curriculum &amp; Instruction (C&amp;I), Superintendent Leadership Team (SLT) and campuses to complete upcoming year district/campuses comprehensive needs assessment &amp; evaluate and adjust plans to reflect changes to programs based on progress and need</li> <li>● Invite and hold Private Non-Profit Schools Consultation and equitable service planning meetings</li> <li>● Publish public notice for intent to apply for ESSA funding through online survey</li> <li>● Present upcoming year's Comprehensive Needs Assessment and District Plan to DCIT &amp; Board for review and approval</li> <li>● Review campus and district needs assessment and district/ campus</li> </ul>



	<p>continuous improvement plans for services specified in grant applications &amp; evaluate campus needs. (Quarter 4-Final Review)</p> <ul style="list-style-type: none"> <li>• Monitor grant programs for spending alignment to allowable program activities per grant, campus and district plans (Quarter 4-Final Review)</li> <li>• Attend Federal/State Grant Implementation training through the Fed/State Office for new awardees.</li> </ul>
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## Funds Distribution

Each grant funded program will distribute the budget allotment in accordance with the approved grant specifications and in accordance with established federal, general fund and state procedures outlined within each grant application.

## Funds Obligation

All grant funds are expected to be spent within the corresponding school calendar year for which they were awarded, in alignment to allowable activities set forth by each granting agency in the grant application. Grant funds may not be obligated prior to their allowable spending timelines imposed by each granting agency, nor after the ending date outlined by each award granting agency. Careful consideration should be given to each expenditure's allowability so that ECISD spends grant funds in a fiscally responsible manner in accordance with each grant program's individual and unique design.

For those with an extended end date and continuing services into the next school year, as awarded from the granting agency, i.e. Sept 30- ending date, obligation of services should be minimal to include summer learning, professional development and software licensing fees for activities and services after the June 30 cut-off date. End of year spending should not be used to stockpile supplies and materials for services outside of the allowable use of funds date awarded by each grant. For the second year of a multi-year awarded grant, a new budget with the corresponding year should be established to follow July 1- June 30 of the next funding year.

Grant	Beginning Date	Ending Date (EOY)
Federal entitlement grants: Carl Perkins, IDEA-B, ESSA, ESSER	July 1 or when application is received in an approvable format	June 30
State entitlements	July 1	June 30
Competitive Federal, State, and Gifted Grants	In accordance to established dates within the program	June 30

## Authority for Procurement

ECISD entitlement and competitive grants will follow procurement procedures as outlined by CH (Legal, Local and Regulation) as well as all guidelines imposed by the federal/state award:

- [Ector County ISD- Purchasing and Acquisition](#)
- [TEA- Finance and Grants](#)
- [Education Code- School Finance and Fiscal Management](#)



Under Board Policy CHA (Regulation) the following persons have been delegated authority to act as agents for ECISD in carrying out the purchasing activities of the District:

- Superintendent
- The Chief Financial Officer
- Director of Purchasing

They are the **only individuals who can obligate** a purchase with the Director of Purchasing assigned as the authorized officer to make the purchase for the district.

- All purchases shall be made by issuing an official Ector County Independent School District Purchase Order.
- No obligation will be recognized by the District until an official purchase order is issued.
- Any purchases made without this authorization is considered a “confirming” (unauthorized) purchase order. Anyone creating or authorizing a purchasing commitment prior to approval may be liable to prosecution under [Texas Penal Code Chapter 39. Abuse of Office](#)
- An officer, employee, or agent of a school district commits an offense if the person with criminal negligence makes or authorizes separate, sequential, or component purchases to avoid the requirements of Section 44.031(a) or (b). An offense under this subsection is a Class B misdemeanor and is an offense involving moral turpitude.
- An officer, employee, or agent of a school district commits an offense if the person with criminal negligence makes or authorizes separate, sequential, or component purchases to avoid the requirements of Section 44.031(a) or (b). An offense under this subsection is a Class B misdemeanor and is an offense involving moral turpitude.
- An officer, employee, or agent of a school district commits an offense if the person with criminal negligence violates Section 44.031(a) or (b) other than by conduct described by Subsection (b). An offense under this subsection is a Class B misdemeanor and is an offense involving moral turpitude.
- An officer or employee of a school district commits an offense if the officer or employee knowingly violates Section 44.031, other than by conduct described by Subsection (b) or (c). An offense under this subsection is a Class C Misdemeanor.
- Under Board Policy CH (Local) Responsibility for Debts, the Board shall assume responsibility for debts incurred in the name of the District so long as those debts are for purchases made in accordance with the adopted Board Policy and current administrative procedures. The Board shall not be responsible for debts incurred by persons or organizations not directly under Board control; persons making unauthorized purchases shall assume full responsibility for all such debts.

## Federal Grant Purchasing Process

All grants will follow guidance provided within the Ector County ISD Purchasing Manual ([ECISD Purchasing Manual](#)) in addition to following federal/ state procurement procedures as noted below. Texas Education Agency guidance states, “A district needs a strong control environment in which to perform the purchasing function”. Three activities govern a strong and successful control environment:

1. A comprehensive purchasing manual.
2. Monitoring purchasing activities by all employees involved with the procurement of goods and

services. (Follow purchase order requirements through requisitioning process).

3. Training personnel on purchasing procedures.

## Procurement Levels when using Federal Funds

\$1 - \$49,999	<p>Micro-purchases must be distributed to the maximum extent practicable, among qualified suppliers. The price must be reasonable which will be determined by providing at least 2 written quotes in accordance with Methods of Procurement, 2 CFR 320 (a). If the second quote is less expensive than the used quote, reasonability must be based on research, experience, purchase history, or other information &amp; documented accordingly on the requisition for the purchase.</p> <p>ECISD will consider pricing as reasonable in the following instances and forego the requirement for 2 quotes for micro-purchases:</p> <p>A. Educational Service Center contracts</p> <p>ECISD maintains the right to self-certify the federal threshold to \$49,999 as long as it maintains one of the following:</p> <ul style="list-style-type: none"> <li>○ Low risk auditee for the most recent federal audit (200.520)</li> <li>○ Conduct an annual internal risk assessment/fraud risk to identify, mitigate, and manage financial risk</li> </ul>
Above \$50,000	<p>Follow State Law: Competitive Procurement Methods must be followed. State law requires a competitive procurement bid or RFP or purchase from an approved co-op awarded contract. When using COOP for purchases over \$250,000, a cost price analysis must be used. All district contracts for the purchase of goods and services, except for contracts for the purchase of produce or vehicle fuel, valued at \$50,000 or more in the aggregate for each 12-month period, shall be made in the method that provides the best value for the district. (CH Legal)</p>

## Credit Card/ P-Card Procedures: Federal & State Funds:

Credit cards will not be issued for the use of federal and state procurement of funds with the following exceptions:

- The life skills program which will be offered through special education funds. Credit cards may be used for integrating special education students into the community for life skills training for such purchases deemed appropriate.
- District issued credit cards may be used for registration fees associated with the travel under the limited circumstance: If the vendor prefers or does not allow purchase orders or checks.
- P-Cards may be used with federal and state funds in accordance with purchasing procedures for official travel associated with a grant as long as established federal/ state/ general procedures are followed.

## General Purchasing Procedures: Federal funds

<b>Responsible Party</b>		<b>Action</b>
Department/Campus Administrator	1.1	Ensure purchase is reasonable, necessary, allowable and allocable as supported in accordance to a need identified and documented through problem statement and campus/district plan strategy and allowable in accordance to the grant funding awarded application.
Department/Campus Administrator	1.2	Follow federal competition requirements by purchase thresholds: under \$50,000, get two written quotes; over \$50,000-\$250,000, contact purchasing and proceed with the RFP process. If a member of a co-op, then get 2 quotes up to \$250,000. If a member of a co-op and over \$250,000, ask purchasing to provide a copy of the price cost analysis or to perform a cost-price analysis.
Department/Campus Administrator	1.3	Check dates of services and make sure they align to the current school year and availability of funds in the grant. Annual fees with federal funds should end prior to the end date of the grant; while all other activities and services should end by June 30. *If a license fee shows "annual fee", check the dates to be certain that they will be finished within the grant end date. *Remember services may not begin prior to having a requisition entered and approved through a PO.
Department/Campus Administrative support staff	1.4	Submit a requisition and attach the above documents to demonstrate your compliance with federal guidelines.
Department/Campus Administrative support staff	1.5	Follow up with accounting to make sure your PO gets issued and paid within the school year in accordance with local policies (30 days from the time an invoice is issued).
Managing Supervisor/ Grant manager	1.6	Review and approve all requisitions that follow federal, state and local laws in accordance to approved grant application.

## General Purchasing Procedures: State funds

<b>Responsible Party</b>		<b>Action</b>
Department/Campus Administrator	1.1	Ensure purchase is reasonable, necessary, allowable and allocable as supported in accordance to a need identified and documented through problem statement and campus/district plan strategy and allowable in accordance to the grant funding awarded application.
Department/Campus Administrator	1.2	Follow state competition requirements by purchase thresholds: under \$50,000, get two written quotes; over

		\$50,000-\$150,000, contact purchasing and proceed with the RFP process. If a member of a co-op, then get 2 quotes.
Department/Campus Administrator	1.3	Check dates of services and make sure they align to the current school year and availability of funds in the grant. Annual fees with state funds should end prior to the end date of the grant; while all other activities and services should end by June 30. *If a license fee shows “annual fee”, check the dates to be certain that they will be finished within the grant end date. *Remember services may not begin prior to having a requisition entered and approved through a PO.
Department/Campus Administrative support staff	1.4	Submit a requisition and attach the above documents to demonstrate your compliance with federal guidelines.
Department/Campus Administrative support staff	1.5	Follow up with accounting to make sure your PO gets issued and paid within the school year in accordance with local policies (30 days from the time an invoice is issued).
Managing Supervisor/ Grant manager	1.6	Review and approve all requisitions that follow state and local laws in accordance to approved grant application.

## Travel (All federal and state funded programs)

Travel with federal and state grant program funds will follow Local and State policy guidelines as established in local procedures, (DEE Legal & CBB Legal), as well as 2 CFR 200.475 when using federally funded grants. Staff with positions above executive director may be restricted from traveling with federal dollars in accordance to each federal grant program guidelines allowable v. unallowable uses; when not allowable, funds may not pay for school officials above executive director to travel. Additionally, all federal travel by the individual employee deemed necessary for the federal project implementation paying for the travel will follow the designated procedures as noted below.

Federal travel obligates at the time travel is taken. In order to prepare travel advances, ECISD has defined travel taken as the time the requisition is approved for the travel, and a PO/ check is issued. If the travel is canceled or for whatever reason not taken, the federal award will be repaid with the general funds of the department requesting the travel.

The federal award will NOT be charged per diem for food costs associated with travel, nor will hotel taxes or additional room fees; i.e., resort fees, to be charged to the federal award.

General funds may be used to supplement the cost of your travel. Different federal and state funds may not be used to supplement your travel request. General funds may be used for the following:

- Meals associated with travel: Meals (food per diem) will not be charged to federal or state program funds. Meals may be paid out of general funds in accordance with established district guidelines.

Travel costs in excess of allowable gsa.gov to include hotel taxes, hotel overages, resort fees, and excess of travel by plane or mileage per diem in accordance to allowable travel by local Travel Procedures. The gsa.gov hotel per diem overage will become a local responsibility.

District issued credit cards may be used for registration fees associated with the travel under the limited circumstance: If the vendor prefers or does not allow purchase orders or checks. P-Cards may also be used to pay for approved travel.

You can see a full overview of travel procedures with the link provided:

[ECISD Federal and State Travel Procedures](#)

## Federal & State Travel Procedures

Responsible Party		Action
Department Supervisor/Campus Principal	1.1	<ul style="list-style-type: none"> <li>○ Ensure travel is reasonable, necessary, allowable and allocable as supported in accordance to a need identified and documented through problem statement and campus/district plan strategy and allowable in accordance to the grant funding awarded application.</li> <li>○ Out-of-state travel will require a written justification form to be submitted to the executive director of the federal program and approved in accordance with the procedures outlined by the granting agency (TEA) prior to travel being taken. Please attach the approved justification to the travel requisition. To access the out of state travel justification form, refer to the appendix of this manual.</li> </ul>
Department/Campus Administrative Support Staff	1.2	<ul style="list-style-type: none"> <li>○ Ensure that you have a budget from general and federal/state funds in the correct accounts to travel. Move funds into the correct accounts through the budget change process if necessary.</li> <li>○ Ensure staff is set up as a vendor for the travel being taken.</li> </ul>
Department/Campus Administrative Support Staff	1.3	<p>Prepare the following documents to submit your request for travel <b>prior to</b> requisitioning your travel:</p> <ul style="list-style-type: none"> <li>○ <b>Printed mileage</b> The Google maps site must be used to indicate mileage from city to city when using the federal per mileage rate calculated for the round- trip cost via driving.</li> <li>○ <b>Printed Airfare Quote</b> ✓ The airfare must be the cheapest airline ticket available at least two weeks prior to travel being taken; business class quotes are not allowed. <b><u>Amounts provided to employee for travel (road or air) will be determined from the cheaper of the two.</u></b> For example, if mileage is \$ 349.00, but an airline</li> </ul>

		<p>ticket is \$150.00, then the \$150.00 will be allowed for travel out of federal funds and the overage will have to be used through the general fund.</p> <ul style="list-style-type: none"> <li>○ <b>Printed Registration Confirmation-</b> email confirmations, screenshots of your cart, or quotes are allowed as documentation to use Special Revenue Funds (SRF). If an invoice is generated at the time of registration, the documentation may be added to the requisition and Special Revenue Funds (SRF) may be used to pay the registration for individuals.</li> <li>○ <b>Printed Rental Car Quote</b></li> <li>✓ Rental cars are only allowable when the rental car is more cost effective than other transportation such as a taxi or shuttle. Prior to travel being taken documentation must be provided to the federal and state office verifying that renting a car is cheaper than area taxi or shuttles. Special Revenue Funds (SRF) will only cover the amount based on quotes provided from the cost of taxi and shuttle. (Airport to hotel and back. Hotel to conference and back) A tax exemption form will be submitted when renting a car. <a href="#">Motor Vehicle Rental Tax Exemption Certificate</a></li> <li>✓ <b>Hotel Reservation Confirmation</b> If traveling within Texas with a hotel stay, the <a href="#">HOTEL STATE TAX EXEMPTION FORM</a> must be present to the hotel at check-in to avoid State sales tax charges for the hotel room. Special Revenue Funds will not reimburse for ANY taxes including parking taxes, and or resort fees associated with the hotel stay. <a href="#">Sales Tax Exemption Form (Parking)</a></li> <li>✓ If multiple people are staying in one hotel room, the aforementioned Special Revenue Funds (SRP) will only pay for one per diem per room. It will not be based on per employee staying in the room.</li> <li>✓ The hotel receipt must be in the individual's name requesting the per diem on the travel advance.</li> <li>○ If traveling out of the state of Texas with federal funds, include a copy of the completed "Request for Out of State Travel". This should be on file with your administrator and added to the requisition when requesting funds.</li> <li>○ If a large group of individuals with 20 or more employees are attending a conference, the executive director, director or campus principal may use their individual p-card to pay for all employee's rooms who are attending the conference. The requisition must include the group rate with the amount that will be charged per night, the number of rooms that will be reserved, and a breakdown of the accounts. Special Revenue funds will only pay for the hotel per diem rate per room. Any overages, taxes, and resort fees will be paid</li> </ul>
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		through the general fund. The requisition must also include the list of employees with a room reserved under the group room quote.
Department/Campus Administrative Support Staff	1.4	<ul style="list-style-type: none"> <li>○ Complete the ECISD Travel Request form and submit to the appropriate grant supervisor for review and approval.</li> <li>✓ Separate on the travel form what will be charged to the federal or state award as well as what will be charged to general funds by providing the account numbers and amounts provided in each section of the travel request form.</li> <li>✓ At the top of the travel request form, put the total that will be charged to your general fund accounts as well as the total that will be charged to your federal/state accounts by account number.</li> <li>✓ Submit the supporting documents in 1.3 with your travel request. <b>The travel request must include the supervisor's signature and must be submitted to the federal/state program office for the Executive Director's review and signature.</b> In the Executive Director's absence, the Coordinator of ESSER 3 programs may sign off on the travel.</li> </ul>
Appropriate grant supervisor	1.5	Review and approve travel related to the grant managed in accordance to federal, state and general fund guidelines prior to requisition being entered. Advise department/ campus administrative staff when 1.3 paperwork has been approved.
Department/Campus Administrative Support Staff	1.6	Requisition travel and upload all supporting artifacts in 1.3 into the requisition.
Department/Campus Administrative staff	1.7	Follow requisition through to PO and make sure that appropriate registration invoices are submitted so that registration checks are paid prior to the travel being taken.
Travelers	1.8	<p>Submit upon your return to your administrative staff the following in order to process your travel return:</p> <ul style="list-style-type: none"> <li>✓ Hotel receipt- Must be in the individual's name who received the funds on the travel advance. If a large group of individuals with 20 or more employees' rooms were paid for as a block through the P-Card, the executive director, director or campus principal that paid for the block of rooms with the P-Card must support the group list with receipts that show the employees' rooms and names associated with approved travel.</li> <li>✓ Incidental receipts such as Parking, Taxi, Uber, Rental Car, gas receipts. The individual name must be on the receipt for the documentation they are submitting. (Keep in mind taxi is reimbursed from hotel to conference and back, including the airport to hotel and back <u>only</u>.) <b>The time and destination</b></li> </ul>

		<p><b>will be reviewed by the federal and state office for taxi and uber receipts.</b></p> <ul style="list-style-type: none"> <li>✓ Proof of conference attendance. The following may be submitted as proof of attendance: <ul style="list-style-type: none"> <li>Certificate of Attendance</li> <li>Picture of conference name badge or conference booklet</li> </ul> </li> <li>✓ Upon completing your District approved Travel Settlement form if you spent less than what you were allotted with your Travel Advance (check) then you will be required to reimburse the District within 10 days of being notified that you owe funds. The Federal and State office will reimburse General Funds (GF) or Special Revenue Funds (SRF) based on the Travel Settlement form.</li> </ul>
Department/Campus Administrative Support Staff	1.9	<ul style="list-style-type: none"> <li>○ Submit completed travel settlement forms to your grant supervisor with artifacts in 1.8 for review and signature within 10 business days of return from trip. Signatures from the Supervisor and the Federal and State office are required before submission. Federal and State will review the Travel Settlement prior to submitting the form to Accounting. Checks or Money Orders should not be obtained prior to receiving notification for the Accounting office on funds owed.</li> </ul>

## DISTRICT VEHICLE USE

Use of district vehicles and the related charges are allowed if the following are attached to the journal voucher charging expenditures:

1. Copy of the district vehicle request placed in InfoFinder.
2. Field trip manager system invoice with mileage charged for the round trip at current IRS mileage rate.
3. List of riders, purpose of trip.
4. Copies of any receipts for fuel purchases, vehicle item purchases as evidence of trip.

## Preventing Theft

Federal and state grants will implement strategies in alignment to district Regulation CFB, Exhibit C & Damaged or Stolen Property: Regulation CFB, Exhibit B to guard against theft and misuse of grant purchased items.

### CTE: Preventing Theft

- Several professionals are in the line of approvers for requisitions
- Inventory processes are in place (computerized and on paper)
- Inventory items are tagged with ECISD labels and tags will include the wording "PROPERTY OF ECISD", a barcode of the asset number of the item for scanning purposes, and the actual asset number as designated by the District.



- In-house auditing occurs biannually

Any potential contractor being paid from federal funds will complete the purchasing department's process for federal and/or state vendor background checks.

## Sole Source Vendor (FEDERAL GRANT FUNDS)

A Sole Source Affidavit is not sufficient when using federal funds. If federal funds are going to be used on a vendor that claims to be a sole source the district **will need to obtain approval from TEA first**. The Purchasing Department will submit to TEA a Request for Non-competitive Procurement (Sole-Source) Approval form. If TEA approves the request, the sole source vendor can be used. If TEA rejects the request, federal funds cannot be used for this purchase. Either general funds will need to be used or a bid/RFP will need to be done for the project. Different programs would require their own TEA approval even if the same vendor is to be used.

**The TEA Request for Noncompetitive Procurement (Sole-Source) Approval form can be obtained by calling the purchasing department at 456-9719.**

## EDGAR Compliance

The following provisions are required and apply when Ector County ISD expends federal funds for any contract resulting from this procurement process. The Ector County ISD is the subgrantee or subrecipient by definition.

In addition to other provisions required by the federal agency or recipient/subrecipient, all contracts made by the recipient or subrecipient under the Federal award must contain provisions covering the following, as applicable.

- A. Contracts for more than the simplified acquisition threshold currently set at \$250,000 which is the inflation adjusted amount determined by the Civilian Agency Acquisition Council and the Defense Acquisition Regulations Council (Councils) as authorized by 41 U.S.C. 1908, must address administrative, contractual, or legal remedies in instances where contractors violate or breach contract terms, and provide such sanctions and penalties as appropriate.

Pursuant to Federal Rules (A) above, when federal funds are expended by Ector County ISD, Ector County ISD reserves all rights and privileges under the applicable laws and regulations with respect to this procurement in the event of breach of contract by either party.

Does the vendor agree? YES, \_\_\_\_\_ Initials of Authorized Representative of Vendor

- B. Termination or cause and for convenience by the grantee or subgrantee including the manner by which it will be affected and the basis for settlement. (All contracts in excess of \$10,000)

Pursuant to Federal Rules (B) above, when federal funds are expended by Ector County ISD, Ector County ISD reserves all rights and to immediately terminate any agreement in excess of \$10,000 resulting from

this procurement process in the event of a breach or default of the agreement by Vendor, in the event vendors fails to: (1) meet schedules, deadlines, and/or delivery dates within the time specified in the procurement solicitation, contract, and/or a purchase order; (2) make any payments owed; or (3) otherwise perform in accordance with the contract and/or the procurement solicitation. Ector County ISD also reserves the right to terminate the contract immediately, with written notice to the vendor, for convenience, if Ector County ISD believes, in its sole discretion, that it is in the best interest of Ector County ISD to do so. The vendor will be compensated for work performed and accepted and goods accepted by Ector County ISD as of the termination date if the contract is terminated for convenience of Ector County ISD. Any award under this procurement process is not exclusive and Ector County ISD reserves the right to purchase goods and services from other vendors when it is in the best interest of Ector County ISD.

- F. Rights to Inventions Made Under a Contract Agreement.** If the Federal award meets the definition of “funding agreement” under 37 CFR §401.2(a) and the recipient or subrecipient wishes to enter into a contract with a small business firm or non-profit organization regarding the substitution of parties, assignment or performance of experimental, developmental, or research work under that “funding agreement, “; the recipient or subrecipient must comply with the requirements of 37 CFR Part 401, “Rights to Inventions Made by Nonprofit Organizations and Small Business Firms Under Government Grants, Contracts and Cooperative Agreements,” and any implementing regulations issued by the awarding agency.

Pursuant to Federal Rule (F) above, when federal funds are expended by Ector County ISD, the vendor certifies that during the term of an award for all contracts by Ector County ISD resulting from this procurement process, the vendor agrees to comply with all applicable requirements as referenced in Federal Rule (F) above.

Does the vendor agree? YES, \_\_\_\_\_ Initials of Authorized Representative of Vendor

- G. Clean Air Act (42 U.S.C. 7401-7671q.) and the Federal Water Pollution Control Act (33 U.S.C. 1251-1387), as amended –** Contracts and subgrants of amounts in excess of \$150,000 must contain a provision that requires the non-Federal award to agree to comply with all applicable standards, orders or regulations issued pursuant to the Clean Air Act (42 U.S.C. 7401-7671q) and the Federal Water Pollution Control Act as amended (33 U.S.C. 1251-1387). Violations must be reported to the Federal awarding agency and the Regional Office of the Environmental Protection Agency (EPA).

Pursuant to Federal Rule (G) above, when federal funds are expended by Ector County ISD, the vendor certifies that during the term of an award for all contracts by Ector County ISD resulting from this procurement process, the vendor agrees to comply with all applicable requirements as referenced in Federal Rule (G) above.

Does the vendor agree? YES, \_\_\_\_\_ Initials of Authorized Representative of Vendor

- H.** Debarment and Suspension (Executive Orders 12549 and 12689) – A contract award (see 2 CFR 180.220) must not be made to parties listed on the government wide exclusions in the system for Award Management (SAM), in accordance with the OMB guidelines at 2 CFR 180 that implement Executive Orders 12549 (3 CFR part 1986 Comp., p. 189) and 12689 (3 CFR part 1989 Comp., p.235), “Debarment and Suspension”. SAM exclusions contain the names of recipients and subrecipients debarred, suspended or otherwise excluded by agencies, as well as parties declared ineligible under statutory or regulatory authority other than Executive Order 12549.

Pursuant to Federal Rule (H) above, when federal funds are expended by Ector County ISD, the vendor certifies that during the term of an award for all contracts by Ector County ISD resulting from this procurement process, the vendor certifies that neither it nor its principals is presently debarred, suspended, proposed for debarment, declared ineligible, or voluntarily excluded from participation by any federal department or agency.

Does the vendor agree? YES, \_\_\_\_\_ Initials of Authorized Representative of Vendor

- I.** Byrd Anti-Lobbying Amendment (31 U.S.C. 1352) – Contractors that apply or bid for an award exceeding \$100,000 must file the required certification. Each tier certified to the tier above that it will not and has not used Federal appropriated funds to pay any person or organization for influencing or attempting to influence an officer or employee of any agency, a member of Congress, officer or employee of Congress, or an employee of a member of Congress in connection with obtaining any Federal contract, grant or any other award covered by 31 U.S.C. 1352. Each tier must also disclose any lobbying with non-Federal funds that take place in connection with obtaining any Federal award. Such disclosures are forwarded from tier to tier up to the non-Federal award.

Pursuant to Federal Rule (I) above, when federal funds are expended by Ector County ISD, the vendor certifies that during the term and after the awarded term of an award for all contracts by Ector County ISD resulting from this procurement process, the vendor certifies that it follows all applicable provisions of the Byrd Anti-Lobbying Amendment (31 U.S.C. 1352). The undersigned further certifies that:

- (F)** No Federal appropriated funds have been paid or will be paid for on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of congress, or an employee of a Member of Congress in connection with the awarding of a Federal contract, the making of a Federal grant, the making of a Federal loan, the entering into a cooperative agreement, and the extension, continuation, renewal, amendment, or modification of a Federal contract, grant, loan, or cooperative agreement.
- (1) If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any

agency, a Member of Congress, an officer or employee of congress, or an employee of a Member of Congress in connection with this Federal grant or cooperative agreement, the undersigned shall complete and submit Stand Form-LLL, "Disclosure Form to Report Lobbying", in accordance with its instructions.

- (2) The undersigned shall require that the language of this certification be included in the award documents for all covered sub- awards exceeding \$100,000 in Federal funds to all appropriate tiers and that all subrecipients shall certify and disclose accordingly.

Does the vendor agree? YES, \_\_\_\_\_Initials of Authorized Representative of Vendor

**RECORD RETENTION REQUIREMENTS FOR CONTRACTS FOR  
WITH FEDERAL FUNDS - 2 CFR § 200.333**

When federal funds are expended by Ector County ISD for any contract resulting from this procurement process, the vendor certifies that it will comply with the record retention requirements detailed in 2 CFR § 200.333. The vendor further certifies that the vendor will retain all records as required by 2 CFR § 200.333 for a period of three years after grantees or sub grantees submit final expenditure reports or quarterly or annual financial reports, as applicable, and all other pending matters are closed.

Does the vendor agree? YES, \_\_\_\_\_Initials of Authorized Representative of Vendor

**CERTIFICATION OF COMPLIANCE WITH THE ENERGY POLICY AND CONSERVATION ACT**

When federal funds are expended by Ector County ISD for any contract resulting from this procurement process, the vendor certifies that it will comply with mandatory standards and policies relating to energy efficiency which are contained in the state energy conservation plan issued in compliance with the Energy Policy and Conservation Act (42 U.S.C. 6321, et seq.; 49 C.F.R. Part 18; Pub. L. 94-163, 89 Stat. 871).

Does the vendor agree? YES, \_\_\_\_\_Initials of Authorized Representative of Vendor

**CERTIFICATION OF COMPLIANCE WITH BUY AMERICA PROVISIONS**

Vendor certifies that vendor is compliant with all applicable provisions of the Buy America Act. Purchases made in accordance with the Buy America Act must still follow the applicable procurement rules calling for free and open competition.

Does the vendor agree? YES, \_\_\_\_\_Initials of Authorized Representative of Vendor

<b>CERTIFICATION OF NON-COLLUSION STATEMENT</b>
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Vendor certifies under penalty of perjury that its response to this procurement solicitation is in all respects bona fide, fair, and made without collusion or fraud with any person, joint venture, partnership, corporation or other business or legal entity.

Does the vendor agree? YES, \_\_\_\_\_ Initials of Authorized Representative of Vendor

Vendor agrees to comply with all federal, state, and local laws, rules, regulations and ordinances, as applicable. It is further acknowledged that the vendor certifies compliance with all provisions, laws, acts, regulations, etc. as specifically noted above.

Company Name: \_\_\_\_\_

Address: \_\_\_\_\_

City: \_\_\_\_\_ State: \_\_\_\_\_ Zip: \_\_\_\_\_

Phone Number: \_\_\_\_\_ Fax Number: \_\_\_\_\_

Email Address: \_\_\_\_\_

Printed Name of Authorized Representative: \_\_\_\_\_

Signature of Authorized Representative: \_\_\_\_\_

## Purchase Orders

The Purchasing department is given School Board authority to procure specific goods and services needed by the schools and departments through the issuance of purchase orders. The signed purchase order is a formal document and is a binding commitment between the district and the vendor. Original, signed purchase orders are considered the contract.

Purchase orders are issued directly from the Purchasing department. They are generated and controlled by number sequence through the District's financial software system (MUNIS).

Requisitions are entered and approved on-line. After the Purchasing department has approved the requisition, the Purchasing Director will convert the requisition to a purchase order. Only original, signed purchase orders are considered contracts for orders. Purchase orders have an electronic signature of the approved purchasing agent according to Board policy: The Director of Purchasing (purchasing agent).

\*Please note the following:

1. Federal/ state purchases must not be obligated before the requisition process has been initiated in MUNIS. Services may not begin prior to the issuance of the approved district purchase order.
2. Services may not occur without a District Issued PO. A vendor must be cleared by Purchasing prior to any formal agreements being entered.
3. All federal/state purchases must be made within the allowable uses as dictated by the granting agency to include the following:
  - Within the grant identified awarding year; i.e. July 1, 20xx through June 30, 20xx.
  - Allowable activities as approved by the awarding agency in the approved grant application
  - Be Allocable, reasonable and necessary

## Internal Controls

### Financial Management

Financial Management is managed through MUNIS software. Access is set up by the Information Systems Operation Technician or Information Systems Business Analyst.

LOGIN – MUNIS is single-sign on product and is accessible from the staff member’s network login.

ROLES – Job positions that require access to GL accounts are defined by roles in MUNIS. Within the ROLES, specific account access is defined by FUND, FUNCTION, OBJECT, SUB-OBJECT, DEPARTMENT, and/or PROGRAM INTENT CODE. The job positions roles are decided by the Chief Financial Officer.

WORKFLOW – Financial transactions that require approval process are set up in MUNIS with workflow. Workflow is designated by the ROLES of that job position. The transaction will require levels of approval before it becomes live on the General Ledger. Workflow is decided by the Chief Financial Officer.

### Procurement

Procurement is managed through MUNIS software. Access is set up by the Information Systems Operation Technician or Information Systems Business Analyst.

LOGIN – MUNIS is single-sign on product and is accessible from the staff member’s network login.

ROLES – Job positions that require access to GL accounts are defined by roles in MUNIS. Within the ROLES, specific account access is defined by FUND, FUNCTION, OBJECT, SUB-OBJECT, DEPARTMENT, and/or PROGRAM INTENT CODE. The job positions roles are decided by Chief Financial Officer and Purchasing Director.

WORKFLOW – Procurement transactions that require approval process are set up in MUNIS with workflow. Workflow is designated by the ROLES of that job position. The transaction will require levels of approval before it becomes live on the General Ledger. Workflow is decided by the Chief Financial Officer and Purchasing Director.

### Time and Effort

ECISD extra duty staff are required to submit Time & Effort in order to be paid out of federal/ state funds.

ECISD extra duty staff must clock in/out of KRONOS timekeeping system or report their extra duty time through the approved district timesheet upon the arrival of the day of their extra duty in order to confirm their 8 hour work day obligation has been met. Using a timesheet should only be granted in special occasions where Kronos machines are not readily available to gather time and must be pre-approved by the grant manager. There may be no more than two missed punches per month on an employee's timesheet except for the following circumstances:

- Jury Duty
- Professional development offsite
- Doctor's appointments

Grant Managers and Direct Program Supervisors will reconcile the time and effort submitted by the staff member to their KRONOS/ ECISD Monthly Timesheet, and required student sign in form from the district approved Daily Report for Attendance.

Kronos access for professional staff is added upon the completion of face-to-face training. It is necessary when performing extra duty assignments that require federal/state extra duty pay. Approval from the grant program managers is required prior to setting up staff to be paid out of federal/state accounts for extra duty.

#### **Extra Duty Assignment in Kronos**

1. Changes in MUNIS will trigger a notification to Information Systems staff or the Federal/State Program Executive Director will notify Information Systems of KRONOS access.
2. Information Systems staff will confirm staff members in a position.
3. Information Systems staff will add employees to KRONOS.
4. Punches may only be altered by the KRONOS Manager. This is typically the campus/department administrative assistant.
5. A time adjustment form must be submitted by the employee and signed by the direct supervisor and KRONOS manager before any electronic adjustment is made. No more than two missed punches a month may be entered by the KRONOS manager.

#### **ESSA Grants and Compensatory Education Grant Funds will utilize the following in planning services:**

- Review Effectiveness of programs as reported by stakeholders through their Initial Planning documents periodically through quarterly meeting notes, and quarterly reviews of planned activities.
- Request stakeholder input through online surveys to the community when seeking ESSA Funding.
- The federal programs executive director will coordinate the completion of the ESSA federal application for funding and work with appropriate directors of programs and stakeholders to determine the annual focus for the planning team.
- All planning will take place before the grant application is submitted by June 30th of each year.

#### **Payroll Processing Procedures of Federal Awards:**

All payroll costs must be approved by the service location supervisor or designee prior to processing. Federal/State funds must also have an additional approval from the program executive director or designee. Requests for supplemental pay will be submitted to the Payroll Department via MUNIS batch. All supplemental pay involving Federal/State funding will be accompanied by supporting documentation as required by each department executive director. Requirements for supporting documentation will be set forth by the program executive director or designee.

All supplemental payroll costs submitted to the Payroll Department will be reviewed and marked for approval or electronically approved by the Payroll Director or designee prior to processing.

#### **Federal Time and Effort Documentation Procedures for ESSA, IDEA-B & ESSER Funds:**

Full Time Multiple Cost Objective Federally Funded Positions will follow the procedures in EDGAR which outlines 7 characteristics of documentation records that must accurately reflect the work performed as follows:

- i. Be supported by a system of internal control which provides reasonable assurance that the charges are accurate, allowable, and properly allocated;
- ii. Be incorporated into the official records of the recipient or subrecipient ;
- iii. Reasonably reflect the total activity for which the employee is compensated by the recipient or subrecipient.
- iv. Encompass both federally assisted and all other activities compensated by the recipient or subrecipient on an integrated basis, but may include the use of subsidiary records as defined in the recipient's written policy;
- v. Comply with the established accounting policies and practices of the recipient or subrecipient.
- vi. Support the distribution of the employee's salary or wages among specific activities or cost objectives if the employee works on more than one Federal award; a Federal award or non-federal award, and indirect cost activity and a direct cost activity; two or more indirect activities which are allocated using different allocation bases; or an unallowable activity and a direct or indirect cost activity.
- vii. Budget estimates (i.e., estimates determined before the services performed) alone do not qualify as support for charges to Federal awards, but may be used to for interim accounting purposes provided that:
  - The system for establishing the estimates produces reasonable approximations of the activity actually performed;
  - Significant changes in the corresponding work activity as defined by the recipient and subrecipient written policies are identified and entered into the records in a timely manner. Short term (such as one or two months) fluctuation between workload categories need not be considered as long as the distribution of salaries and wages is reasonable over the longer term;
  - The recipient and subrecipient system of internal controls includes processes to review after-the-fact interim charges made to a federal award based on the budget estimates. All necessary adjustments must be made, so that the final amount charged to the federal award is accurate, allowable, and properly allocated.



When a federally funded employee's regular job duties are across multiple cost objectives, the federally funded employee will complete the TEA Approved Substitute System for Time and Effort twice a year to account for the multiple cost objectives within the scope of their normal duties when the following conditions are met:

- The employee works on a schedule that includes multiple activities or cost objectives that must be supported by monthly personnel activity reports.
- The employee works on specific activities based on a predetermined schedule.
- The employee does not work on multiple activities or cost objectives at the exact same time on their schedule. Multiple cost objectives are defined in accordance with the set of work activities having multiple objectives on an employee's work schedule that cannot be supported in full from each federal grant contributing to the salary compensation- not the funding sources.

Job descriptions will be signed annually by all federally funded/ or state compensatory funded employees and require the employee's direct supervisor signature who has a direct knowledge of the employee's duties. The job description will delineate funding sources for the federally funded employee to include any split funded employee.

When a federally funded employee qualifies for a stipend as noted below, a stipend agreement, signed by the employee or by the employee's direct supervisor who has direct knowledge of the employee's stipend will be collected annually:

- Extra Additional Duty Stipends- as outlined and approved in our compensation manual for the purposes of additional Title I duties, and professional learning:
  - Extra duty stipends for professional learning will be leveraged when a daily rate/ or half day rate is given for the PD. The following artifact will accompany the signed stipend agreements with the time entry batch: daily sign in sheets for the professional learning given.
  - For Summer Learning all employees will be required to clock in and out using KRONOS. Signed job descriptions are required as well as the documents stated below.
    - Google Form completed for when teacher is absent.
    - Substitutes for Summer Learning will also need to complete a Google Form to be paid for their days worked.
    - When testing, the student roster for students being tested with STAAR/EOC.
- Title One stipend, as approved by Title One principal and supervising EDL, will be payable twice a year, December and June. Federal and State will submit with their time entry batch, the completed and signed stipend agreement for each employee receiving the stipend according to established pay schedules.
- Lead teachers -In the above referenced set of established circumstances, an employee or the employee's supervisor will sign a stipend agreement that delineates each stipend received

annually. Munis will be utilized to collect the employee data necessary to generate each employee stipend agreement or an updated job description delineating the duties performed. The stipend agreements will be sent to each campus through the Title One Crate for an employee's signature. Signed stipend agreements will be reviewed, secured and archived by the campus and program administrators.

When the employee is working across multiple cost objectives that cannot be supported through TEA's Substitute System of Time Effort, a monthly time and effort form will be maintained to support the activities performed across multiple cost objectives. An example of supporting activities of multiple cost objectives would include:

- Function changes; i.e., moving from professional developer to teacher/tutor within the school day without a set schedule to perform said duties.

ECISD utilizes electronic monthly reporting of multiple cost objective funded positions through storing in The Title One Crate the time and effort requiring more than two multiple cost objective functions. Within the federal programs Title One Crate, each campus/program and employee have access to their monthly time and effort for extra duty. Monthly time and effort certification are due to the campus administrator/supervisor on the last working day of the month through the Title One Crate. Employees must report their time according to their effort and account for their time for each month they have split duties. They will print and sign their time and effort certification form and submit it on the last working day of each month to their supervisor or designee. The direct supervisor must verify & sign their time and effort form. Once signed, the supervisor/designee will submit the signed time and effort documents in the Title One Crate. The federal programs staff will verify that all time and effort documents have been received by the campus/program quarterly. The federal programs office will report the adjusted time and effort to the Staff Pay Budget Coordinator, who will then report to accounting to make payroll corrections. Once payroll corrections have been made, the federal programs executive director will be contacted to adjust the federal budget. When an employee is no longer available to sign their time and effort certification, their direct supervisor with working knowledge of their duties, may sign their time and effort certification on behalf of the employee.

#### **Full Time Single Cost Objective Federally Funded Positions:**

Full Time Single Cost Objective Federally Funded Positions will complete semi-annual certifications twice a year. Fully funded federal positions are those positions where the employee works on a single cost objective (activity) regardless of funding sources. The semi-annual certifications will be placed in the appropriate campus/program Title One Crate folder and keep in the TEAMS Federal and State Folder. The appropriate supervisor/designee will distribute the semi-annual certification to the employee for obtaining his signature. Once the signature is obtained, the supervisor will review and sign as well. Signatures will be submitted into the Title One Crate, after-the-fact for work completed through the first semester and after- the- fact for work completed through December 31<sup>st</sup> and May 3<sup>rd</sup> annually. If the employee is not available for signature, the signature of a supervisor with direct knowledge of the employee's schedule will be accepted. Upon being verified by the federal and state programs office, certifications will be electronically archived in the Federal and State TEAMS folder.

Three (3) fully funded federal positions utilizing Perkins funds also complete semi-annual certifications at

the conclusion of each semester. These two semi-annual certification documents are customized to reflect the positions as described in the Perkins grant application, the job descriptions of the personnel, and the actual job duties in practice. They are signed by the employees and the Director of Career & Technical Education (CTE). The original documents are kept on file in the CTE office.

### **Extra Duty/ Supplemental Tutoring Federal/State Positions Funded Through IDEA-B, Title One, Title Two or State Compensatory Education Funds:**

Extra duty and supplemental tutoring for Federal and state positions will complete monthly certifications in accordance with pay periods through the Title One Crate **after** the supplemental program has been approved & employee has been trained on payroll procedures. Federal/ state dollars may not be used to provide supplemental services until those services have received written approval from the executive director and/or assistant superintendent overseeing the campus or program. All extra duty assignments will complete the Extra Duty training for extra duties and submit signed attestations of training upon the completion of the training. Signed job descriptions entailing the extra duties of the employee will be requested, signed and the federal and state programs office will archive the documentation, denoting the funding source at the conclusion of their training. Campuses will keep weekly reports/monthly reports for Kronos in alignment to payroll requirements. (Special circumstance programs will utilize ECISD timesheet with pre-approval of federal state office for the following: Compensatory Services/ Evaluations, CCVYP, TRAC & homeless programs or hourly employees only). Campuses will submit monthly Kronos reports/ ECISD timesheets for extra duty pay with their payroll to the federal/ state office signed by the administrator and employee. Campuses will ensure attendance to tutoring is monitored daily through the Daily Log for Tutoring during the school year or **electronically reporting each student's attendance to tutoring in Focus**. The original Daily Log for Tutoring will be turned in with supplemental and Kronos documentation/ECISD timesheets for student attendance verification.

- Extra duty stipends for professional learning will be leveraged when a daily rate/ or half day rate is given for the PD. The following artifact will accompany the signed stipend agreements with the time entry batch: daily sign in sheets for the professional learning given.
- For summer school stipends, summer school leaders will submit with their time entry batch the completed and signed stipend agreement for each employee along with the following artifacts:
  - Substitute log that demonstrates which teachers were absent.
  - When testing, the student roster for students being tested with STAAR/EOC. attendance verifications will be signed by the administrator

Campuses will submit an electronic payroll batch through MUNIS in accordance with the established deadlines from the federal state program office. Campuses will also submit to the federal and state programs office in accordance with established F&S payroll timelines hard copies of the following documents: Monthly Kronos summary report (signed by administrator overseeing employee & employee performing extra duty) or ECISD timesheets for special purposes as stated above, & Student Daily Report for tutoring or signed attendance verification when applicable. Additionally, tutors report monthly time and effort provided to them through Federal/State/Compliance Programs offices. The supplemental time and effort certification are certified by the employee's handwritten signature and then goes to their direct administrator for verification and electronic processing as well. Upon verification of time and effort

documentation submitted by program administration and supplemental employee as well as a review of student attendance records, payroll is submitted in accordance with established payroll guidelines. Although the federal state and programs office provides flexibility in when a campus/department ends their payroll month, the payroll submitted should not reflect multiple months. Campuses will be allowed to utilize state and federal funds for payroll submissions completed. This limit is imposed to ensure accuracy and support for supplemental services and to maintain strong accounting measures with federal state dollars. Late submissions of payroll with appropriate documentation may only be paid in the federal/state payroll cycle window if approved by their administrator. Upon certification of time and effort for extra duty, certifications are archived electronically in the Title One Crate.

#### **Substitute Teacher Pay with ESSA Grant Funds:**

Substitute teachers are not an allowable expense to compensate with ANY ESSA Grant Funds.

#### **Extra Duty Supplemental Pay for Professional Development through State & Federal ESSA Funds:**

Employees attending professional development off contract time may receive extra duty pay for those employees that are non-exempt or stipends for those employees that are exempt in accordance to the ECISD compensation manual.

All employees will register for professional development opportunities through Eduphoria or any other Professional Development that is provided. If Professional Development is attended out of District for any employee a certificate of completion is required, this can be added to your Eduphoria profile upon your return. Upon confirmed registration for course offerings, employees will sign in and out on the provided attendance sheet for morning and afternoon sessions, which will also include their employee ID number. Non-exempt employees will sign a Professional Learning Extra Duty Pay Agreement for Total Time Served denoting the extra duty for professional development as well as inputting the time they spent in the extra duty. This form will be completed at the conclusion of the training and will serve as both the agreement for extra duty and the time and effort certification. This signed form will be collected from the Federal/State Programs office prior to the training.

All extra duty supplemental pay will be confirmed & rectified by the office responsible for providing the professional development & entered onto the Supplemental Payroll batch in accordance to federal state program's office deadlines. For supplemental pay, the above signed agreement and attendance sign in sheets will be submitted with the batch to verify employee's attendance.

Upon budgetary review, Federal & State Programs will submit payroll to the Payroll office within Payroll's established due dates.

#### **Carl D. Perkins: (All personnel are full time fully funded personnel working on a single cost objective.)**

- Personnel sign job descriptions at beginning of school year
- Personnel sign verifications of completing duties as per job descriptions biannually
- Forms are kept by the Director of CTE

### Food Services Time & Effort Procedures: (All Food services employees work on Single Cost Objectives.)

- In accordance with the Administrator's Reference Manual, direct supervisors review and approve an employees' time worked for each pay period as required.

### State Funded Compensatory Education

The purpose of the State Compensatory Education (SCE) program is to supplement the regular – or basic – education program with compensatory, intensive, and/or accelerated instruction. The program requires additional accelerated instruction be offered to each student who meets one or more statutory or locally-defined eligibility criteria in order to reduce any disparity in performance on assessment instruments administered under Subchapter B, Chapter 39 TEC, or disparity in the rates of high school completion between students at risk of dropping out of school and all other students.

In accordance with Texas Education Code 28.0217, each time a student fails to perform satisfactorily on a required state assessment instrument, ECISD campuses shall provide accelerated instruction to the student in the applicable subject area- using funds appropriated for accelerated instruction for satisfactory performance on state required assessments under [Section 28.0211](#). Accelerated instruction may require participation of the student before or after normal school hours and may include participation at times of the year outside normal school operations.

In accordance with Texas Education Code 29.018, a student is at risk if the student is in prekindergarten, kindergarten or grade 1, 2, or 3, and did not perform satisfactorily on a readiness test or assessment instrument administered during the current school year.

A district must be able to document that students identified under local eligibility criteria were added to a listing of students who were identified under TEC, §29.081. To achieve and maintain compliance, all information must be current. A student at risk of dropping out of school includes each student who is under 26 years of age and who meets one of the following criteria:

- 1) was not advanced from one grade level to the next for one or more school years;
- 2) if the student is in grade 7, 8, 9, 10, 11, or 12, did not maintain an average equivalent to 70 on a scale of 100 in two or more subjects in the foundation curriculum during a semester in the preceding or current school year or is not maintaining such an average in two or more subjects in the foundation curriculum in the current semester;
- 3) did not perform satisfactorily on an assessment instrument administered to the student under [Subchapter B. Assessment of Academic Skills, Chapter 39. Public School System Accountability](#), and who has not in the previous or current school year subsequently performed on that instrument or another appropriate instrument at a level equal to at least 110 percent of the level of satisfactory performance on that instrument;
- 4) if the student is in prekindergarten, kindergarten, or grade 1, 2, or 3, did not perform satisfactorily on a readiness test or assessment instrument administered during the current school year;
- 5) is pregnant or is a parent;

- 6) has been placed in an alternative education program in accordance with [Section 37.006](#) during the preceding or current school year;
- 7) has been expelled in accordance with [Section 37.007](#) during the preceding or current school year;
- 8) is currently on parole, probation, deferred prosecution, or other conditional release;
- 9) was previously reported through the Public Education Information Management System (PEIMS) to have dropped out of school;
- 10) is a student of limited English proficiency, as defined by [Section 29.052](#);
- 11) is in the custody or care of the Department of Family and Protective Services or has, during the current school year, been referred to the department by a school official, officer of the juvenile court, or law enforcement official;
- 12) is homeless, as defined by 42 U.S.C. Section 11302, and its subsequent amendments;
- 13) resided in the preceding school year or resides in the current school year in a residential placement facility in the district, including a detention facility, substance abuse treatment facility, emergency shelter, psychiatric hospital, halfway house, cottage home operation, specialized child-care home, or general residential operation; or
- 14) has been incarcerated or has a parent or guardian who has been incarcerated, within the lifetime of the student, in a penal institution as defined by [Section 1.07](#), Penal Code.

EHBC (Local) defines Students at all grade levels who have been identified as being at risk of dropping out of school and who are not performing at grade level or who did not perform satisfactorily on a state-mandated assessment shall be provided accelerated and/or compensatory educational services based on a need's assessment. The principal shall ensure that each identified student is receiving services.

Annual training through Information Systems will be held to provide campus and program level personnel with how to identify and document students who are at risk by state definition as well as how to identify through local definition in accordance to TEC, §29.081.

The services provided each student shall be consistent with the goals and strategies established in the District and campus improvement plans and shall be reviewed for effectiveness at the close of each grading period. Parents shall be encouraged to participate in the planning of educational services for their child and shall be kept informed regarding the child's progress toward educational goals.

#### **Full Time Split Funded State/Local Positions:**

Full time split funded state and local positions will follow the procedures outlined in Texas Education Code for time and effort documentation. This will be accounted for by keeping a copy of a signed job description for professional positions annually, in accordance with funding split, describing how the position is funded as well as the duties of the supplemental professional position. For split funded instructional support positions, campus administrators for each support position will submit duty schedules. These will be certified by support person signature and campus administrator signature when practical. A direct supervisor can submit a schedule on behalf of the employee if he/she has working knowledge of the staff person's schedule.

#### **Extra duty/ tutoring/summer learning/ professional development State Compensatory positions**

Extra duty, tutoring, summer learning and professional development State Compensatory positions will follow same procedures as supplemental tutoring/ professional development federal positions as follows:

- All employees will register for professional development opportunities through Eduphoria or any other Professional Development that is provided. If Professional Development is attended out of District for any employee a certificate of completion is required, this can be added to your Eduphoria profile upon your return. Upon confirmed registration for course offerings, employees will sign in and out on the provided attendance sheet for morning and afternoon sessions, which will also include their employee ID number. Non-exempt employees will sign a Professional Learning Extra Duty Pay Agreement for Total Time Served denoting the extra duty for professional development as well as inputting the time they spent in the extra duty. This form will be completed at the conclusion of the training and will serve as both the agreement for extra duty and the time and effort certification. This signed form will be collected from the Federal/State Programs office prior to the training.
- Upon confirmed registration for course offerings, employees will sign in and out on the provided attendance sheet for morning and afternoon sessions, which will also include their employee ID number.

Non-exempt employees will sign a Professional Learning Extra Duty Pay Agreement for total time served, denoting the extra duty for professional development, as well as inputting the time they spent in the extra duty. This form will be completed at the conclusion of the training and will serve as both the agreement for extra duty and the time and effort certification. Hourly employees are required to submit the approved Hourly Time Sheet as well as Time and Effort and signed job descriptions.

All extra duty supplemental pay will be confirmed & rectified by the office responsible for providing the professional development & entered onto the Supplemental Payroll batch in accordance with federal state program's office deadlines. For supplemental pay, the above signed agreement and attendance sign in sheets will be submitted with the batch to verify employee's attendance.

## Grant Application Processes

### A. ESSA Title Programs Consolidated Application Planning Process

Title One A, Title One C- Migrant, Title One D, Subpart 2, Title Two A. Campuses begin the planning process for the next year by quarterly reviewing and updating their campus plans. Data from CNA's and campus plans will drive program planning for the upcoming school year. The Comprehensive Needs Assessment and initial campus plan for the upcoming school year is due at the end of June annually. Information contained in the Comprehensive Needs Assessment by campuses and the district are integrated into next year's improvement plans. The Upcoming Year District Comprehensive Needs Assessments/ District Improvement Plan is reviewed by the DCIT full committee in May annually and goes to Ector County ISD School Board in June for approval. Campus level Comprehensive Needs Assessments/ Campus Plans for all campuses initial Campus Improvement Team Reviews are to be completed by the end of June annually for the next year. Campus plans are due for Leadership Executive Director review by August 31st annually with quarterly reviews & updates scheduled for plans in October, January, March, and final reviews completed in May.



ECISD is committed to gathering stakeholder input with regards to planning federal ESSA funding. Funding amounts are shared via online survey to the ECISD community seeking stakeholder feedback. Additionally, meetings are held with the program administrative executive directors and Private Non-Profit schools wishing to participate in the ESSA programs. Information obtained from the surveys and PNPs input are combined with a review of the Comprehensive Needs Assessments (CNAS) results to identify the focus areas for the district's consolidated federal application. The meetings with participating private non-profit schools are held and plans developed for their use of funds are monitored in accordance with their agreed upon plan at the time of consultation. All PNPs awarded funds for services will be maintained at the district level under ORG 301 & ORG 303. PNPs will turn in requests through the appropriate federal programs office to be processed in accordance with district procedures. Purchasing equipment for PNPs is not permitted due to the impossibility of implementing internal controls of the equipment to ensure its use is strictly non-ideological. Should ECISD disagree with the provision of services requested by the PNP, the executive director of federal/state programs will provide in writing to the private school official the reasons why ECISD will not provide the requested services in question in a timely manner, no more than 10 days after receiving a written request by the PNP. This response must be written and mailed or sent through an email correspondence. Should the PNP still disagree, the PNP will again be made aware of their right to contact the TEA Ombudsman assigned to handle PNP complaints. PNP's are first made aware of their rights to disagree and appeal to TEA should they not agree to ECISD's services provided during initial consultation meetings.

### **Title One C- Migrant Services**

Title I C Migrant services will be coordinated, monitored & provided through SSA agreement with Region 18, Education Service Center.

### **B. Carl D. Perkins Planning Process**

Career & Technical Education programs begin planning in the spring semester utilizing locally developed Program Improvement Plans, the TEA required Program Effectiveness Review, and PBMAS reports. Upon TEA's release of the planning amount and the opening of the Perkins application in e-grants, preliminary budgets are developed and the application is completed. The CTE district Local Advisory Council, which is comprised of business leaders, parents, students, teachers, administrators, and special populations' representatives, reviews the LEA's Perkins application documents and local plan; and, the LEA responds to their input directly. Upon application submission, approval, and receipt of the NOGA, Perkins budgets are activated. Funds are predominantly allocated to campuses and the org number of each campus is used in the requisition and expenditure tracking process. In addition to usage of budget codes per the FARSG, Perkins funds are assigned a local sub object code of 01-09 that matches the nine required Perkins expenditure categories:

- Academic CTE Integration
- Link to Postsecondary CTE
- All Aspects of an Industry
- Expand the use of Technology
- Provide Professional Development
- Evaluate Perkins funded Programs
- Initiate, Improve and Expand quality CTE Programs
- Sufficient size, scope and quality



- Activities for Special Populations

### C. Title Two – Professional Development Process for Requesting PD

- All requests for Title II funds will be submitted to the Executive Director of Federal/ State Programs.
- Approved requests will be processed through the federal/state programs office.

### IDEA-B Formula/IDEA-B Preschool/IDEA-B Preschool Deaf/ IDEA-B Procedures

- The IDEA-B Formula application process includes completion of the following:
  - Program Evaluation
  - Comprehensive Needs Assessment
  - Improvement Plan to address areas of need
  - Continuous Monitoring of plan implementation

### IDEA-B Formula/IDEA-B Formula Deaf/IDEA-B Preschool/ IDEA-B Preschool Deaf/IDEA-C Early Childhood Intervention/State Deaf/IDEA-B Discretionary (Deaf) Application Procedures

The IDEA-B Formula application process occurs in the spring, with an extensive review of current campus staff and the number of students receiving special education services. Continuous Improvement Plans and Corrective Action Plans developed by the Special Education Core Analysis Team are also reviewed and utilized in the budget planning process. After TEA's release of the planning amounts and the opening of the application process in the e-grants system, preliminary budgets are developed and the application is completed. Upon application submission, approval, and receipt of the NOGA, the appropriate budgets are activated. Funds are predominately used to ensure adequate staff is available at the campus level to provide programs for students with disabilities. Contract services, supplies and materials are also reviewed and included in the application if applicable.

IDEA-B Preschool Deaf, State Deaf and IDEA-B Discretionary Deaf awards are used to provide educational services for students who are deaf or hard of hearing. The application process is similar to the IDEA-B Formula process. As the fiscal agent for the Regional Day School Program for the Deaf, ECISD provides services for Region 18-member districts. RDSPD Management Board meetings occur 1 time yearly to review program progress, budget planning and Shared

#### Allowable Use of Funds: All Federal and State Grants

- Upon receiving NOGAs for all federal and state grants, campus awards will be made in accordance with the grant application and allowable expenditures of the specific grant. All purchases (payroll, contracted services, supplies and travel) will be monitored by the executive directors of the programs or the assigned grant manager for programmatic compliance of the grant and will follow the accounting procedures outlined by the finance office.

- Corporate credit card accounts, credit cards and/or revolving lines of credit purchases will not be allowed with any federal or state grant program, with the exception of special education life skills purchases needed.
- Procurement Cards (P-Cards) may be used for travel by approved employees for travel advances with federal state funds as long as all federal, state, and general fund guidelines are met.
- Petty Cash for the disbursement of grant funds will not be allowed with any federal or state grant program.
- Supplement v. supplant for all applicable federal and state grants will be monitored in accordance with the definitions outlined in each grant by the grant program director through approving each expenditure request.

## Determination of Allowable and Unallowable Expenditures

ESSA grants will follow programmatic guidelines & assurances of the federal ESSA grant application, ensure that all activities are approved in the federal application, follow supplement v. supplant guidance and that activities have been identified in campus and district needs assessment and plans.

## Guidelines Related to Specific Costs: How to Determine Whether a Cost is Allowable

**All** expenditures of federal grant funds must follow district, federal and state guidelines related to determining whether a cost is allowable. The applicable program director reviews proposed expenditures to determine whether each cost is an allowable use of grant funds before obligating and spending those funds on the proposed goods or service. Costs must also align with approved budget items. Prior approval must be obtained from the Texas Education Agency for any changes in personnel from the approved grant application, for object codes of expenditures not previously approved by TEA, or for expenditures for an object code exceeding grant awards by more than 25% of the total award. Whenever allowed within the guidelines of the grant, indirect costs will be collected.

All costs supported by federal grant funds must meet the cost principles and general standards described below and provided in the Education Department General Administrative Regulations (EDGAR) at 2 CFR Part 200 (Part 200).<sup>1</sup>

When determining whether a cost is an allowable use of federal grant funds, the district must consider the following factors:

- Funds must be expended for reasonable, necessary and allocable costs when conducting grant activities.
- Reasonable means a cost is consistent with prudent business practices and comparable to current market value. 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. When determining reasonableness of a given cost, consider:

- Whether the cost is generally recognized as ordinary and necessary for ECISD's operations or the proper and efficient performance of the award.
  - The restraints or requirements imposed by such factors as: sound business practices; arm's length bargaining; federal, state, local, tribal and other laws and regulations; and terms and conditions of the federal award.
  - Market prices for comparable goods or services for the geographic area.
  - Whether the individuals concerned acted with prudence under the circumstances considering their responsibilities to ECISD, its employees, students, public at large, and the federal government, where applicable.
  - Whether ECISD significantly deviated from its established practices and policies regarding the incurrence of costs, which may unjustifiably increase the federal award's cost.
- Necessary means the cost is needed for the administration or performance of the federal award, and is determined based on the needs of the program. The expenditure must be necessary to accomplish the objectives of the program. When determining whether a cost is necessary, consider:
    - Whether the cost addresses an existing need.
    - Whether the cost is identified in the approved budget or application.
    - Whether there is an educational benefit associated with the cost.
    - Whether the cost aligns with identified needs based on results from a needs assessment.
    - Whether the cost addresses program goals and objectives.
  - Allocable to the federal award. A cost is allocable to the federal award if the goods or services involved are chargeable or assignable to the federal award in accordance with the relative benefit received. This means that the federal grant program received a benefit in proportion to the funds charged to the program. For example, if 50 percent of an employee's time is paid with grant funds, then that employee must spend at least 50 percent of his or her time working on that grant program. This 50 percent must represent actual hours spent working on the grant program, as certified in appropriate documentation, rather than a projection or estimate.
  - Legal under state and local laws and regulations.
  - Consistent with federal, state, and local policies and procedures that apply uniformly to both federally- financed and other activities of ECISD.
  - Be consistently treated as either direct or indirect costs.
  - All costs must be adequately documented and properly supported by the original source documentation (i.e., invoices, receipts, purchase orders, travel vouchers) to be reimbursable.
  - Be incurred during the approved budget period. (Section 200.403)
  - Be determined in accordance with generally accepted accounting principles (GAAP) unless provided otherwise provided in EDGAR.
  - Be the net of all applicable credits. The term "applicable credits" refers to those receipts or reductions of expenditures that operate to offset or reduce expense items allocable to the federal award. Typical examples of such transactions are: purchase discounts; rebates or allowances; recoveries or indemnities of losses; and adjustments for overpayments or erroneous charges. Any credits accruing

to or received by ECISD that relate to the federal award must be credited to the federal award, either as a cost reduction or a cash refund, as appropriate.

- Be determined in accordance with GAAP.
- Not be included or used to meet cost sharing/ match requirements.
- Be adequately documented.
- ECISD programs must comply with the applicable Federal cost principles when expending grant funds. As provided above, federal rules require state and general fund requirements and policies regarding expenditures to be followed. For example, state and/or local policies relating to travel or equipment may be more restrictive than the federal rules, and the more restrictive state and/or local polices must be followed.

## Selected Items of Cost

The rules in EDGAR Part 200 also provide a section examining the allowability rules for 55 specific cost items. This section is commonly referred to as the Selected Items of Cost section and can be found at 2 CFR §§ 200.420-200.475. These cost items are listed in the chart below along with the EDGAR citation where it is discussed whether the item is allowable. An individual should not assume that an item is allowable because it is listed in EDGAR because it may be unallowable despite being included in the selected items of cost section. The expenditure may be unallowable for different reasons, such as: (1) the language used in EDGAR stating that the item is unallowable; (2) the terms and conditions of the grant deem the item unallowable; or (3) state and/or local restrictions dictate that the item is unallowable. The item may also be unallowable because it does not meet one of the cost principles, such as being reasonable because it is considered too expensive. If an item is unallowable for any of these reasons, federal funds cannot be used to buy it.

The list below is not a comprehensive list of costs that may be either allowable or unallowable. Rather, it is the list included in EDGAR at Part 200. For costs not included in this list, an analysis of the factors described above should be performed.

### 200.471 (Allowable costs)

Telecommunications and video surveillance services and equipment are generally allowable, except

- Items under 200.216 defined as vendors owned by foreign entities or foreign governments as listed in 200.216.

ECISD personnel responsible for expending federal grant funds and for determining allowability must be familiar with EDGAR's selected items of cost section. ECISD must adhere to these rules when charging these specific expenditures to a federal grant. When applicable, ECISD staff must check costs against EDGAR's selected items of cost rules to ensure the cost is allowable. In addition, state, local and program-specific rules may deem a cost as unallowable and ECISD personnel must follow those non-federal rules when applicable.

It is possible for the state and/or ECISD to place additional requirements on a specific item of cost.

Under those circumstances, the stricter requirements must be met for a cost to be allowable. Accordingly, ECISD personnel must consult federal, state and general fund requirements when spending federal funds. For example, if ECISD's travel rules are more restrictive than federal and state rules, then ECISD's policies must be followed.

Additionally, in order for a cost to be allowable, the expenditure must also be allowable under the applicable program statute (e.g., Title I of the Elementary and Secondary Education Act (ESEA)), along with accompanying program regulations, non-regulatory guidance and grant award notifications. ECISD personnel responsible for making allowability determinations must ensure the proposed expenditure is allowable under the relevant program statute.

The Education Department General Administrative Regulations (EDGAR) codify the Office of Management and Budget (OMB) Uniform Administrative Requirements, Cost Principles and Audit Requirements for Federal Awards (Uniform Grant Guidance). The Uniform Grant Guidance identifies standards and criteria for properly charging costs to federally funded grant programs. It is available at Part 200 of Title 2 of the Code of Federal Regulations (CFR) (i.e., [2 CFR Part 200](#)).

### **Additional Helpful Questions to Ask When Determining Whether a Cost is Allowable**

In addition to the cost principles and standards described above, the district can refer to this section for useful guidelines when performing an allowability analysis. In order to determine whether federal funds may be used to purchase a specific cost, it is also helpful to ask the following questions:

1. Is the proposed cost allowable under the relevant program?
2. Is the proposed cost consistent with an approved program plan and budget?
3. Is the proposed cost consistent with program specific fiscal rules?
4. Is the proposed cost consistent with EDGAR?
5. Is the proposed cost consistent with special conditions imposed on the grant (if applicable)?

As a practical matter, the applicable program director should also consider whether the proposed cost is consistent with the underlying needs of the program. For example, program funds must benefit the appropriate population of students for which they are allocated. Also, funds should be targeted to address areas of weakness, as necessary. To make this determination, the program director should review data when making purchases to ensure that federal funds meet these areas of concern.

Please contact the applicable program director at ECISD if there are additional questions regarding allowability requirements.

### **Allocable Costs**

Each federal program will decide if a cost is allocable by utilizing the following questions prior to obligating federal funds to the program:

- Does the cost meet the objective of the award?
- Does the cost benefit the award and other work that can be distributed in proportions that may be approximated using reasonable methods?
- Is the cost necessary to the overall operation of the entity and assignable to the award in

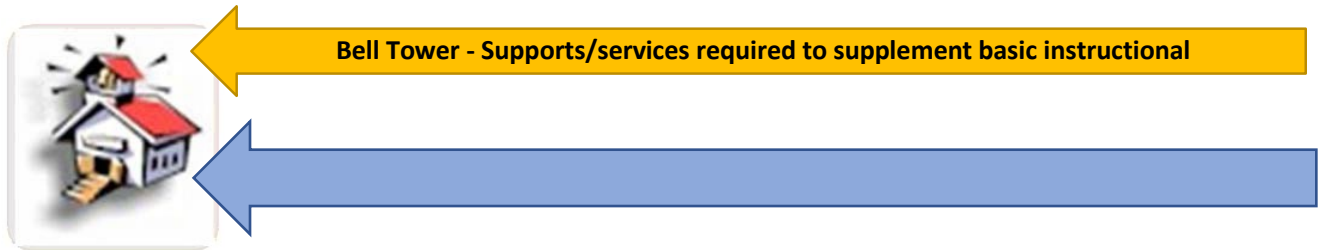
- accordance with the grant?
- Is the purchase defensible in an audit from the Dept. of Education?

## SUPPLEMENT NOT SUPPLANT

### Question to ask:

If we didn't have federal funds available to conduct this activity/service, would we still conduct it with state or general funds anyway?

If the answer to the questions is "yes", you are supplanting because it is no longer a supplementary activity. You must be able to demonstrate that you could not conduct the activity if it weren't for the federal funds.



Consider the following:

- Federal funds may be used only to supplement or augment the educational programs generally offered with state and general funds.
- Federal funds may be used only to provide supplemental services that would not have been provided had the federal funds not been available.
- State or general funds which previously funded activities may not be diverted to another purpose simply because federal funds are now available to fund those activities.
- The use of federal funds may not result in a decrease in state or general funds for a particular activity, which, in the absence of the federal funds, would have been available to conduct the activity.
- Federal funds must supplement or augment that which must be provided by state law or SBOE rule, or any activities which have been adopted as policy by a local school board of education to fund from non-federal sources.
- If federal funds are used to enhance or expand a state mandate, SBOE rule, or local board policy, the federal supplementary activities must be separately identified and clearly distinguishable from the activities identified as necessary for implementing a state mandate, SBOE rule, or local board policy as outlined in the implementation plan.

### **Title 1 C, Migrant Supplement Not Supplant**

Such programs and projects will be carried out in a manner consistent with the objectives of subsections (b) and (c) of section 1120A. "Funds provided under this part shall be used to address the needs of migratory children that are not addressed by services available from other Federal or non-Federal programs." Services for migrant students will be coordinated through SSA Contract with Region18.

### **Title II, Part A Supplement Not Supplant**

Funds received under this subpart shall be used to supplement, and not supplant, non-Federal funds that would otherwise be used for activities authorized under this subpart.

### **Title III, Part A Supplement Not Supplant**

Federal funds made available under this subpart shall be used so as to supplement the level of Federal, State, and general public funds that, in the absence of such availability, would have been expended for programs for limited English proficient children and immigrant children and youth and in no case to supplant such Federal, State, and general public funds.

### **Title IV Supplement Not Supplant**

Funds under this part will be used to increase the level of State, general, and other non-Federal funds that would, in the absence of funds under this part, be made available for programs and activities authorized under this part, and in no case supplant Federal, State, general, or non-Federal funds.

### **IDEA-B Supplement Not Supplant**

Funds paid to a state under Part B of the Act must be used to supplement the level of Federal, State, and general funds (including funds that are not under the direct control of the SEA or LEAs) expended for special education and related services provided to children with disabilities under Part B of the Act, and in no case to supplant those Federal, State, and general funds.

### **Carl Perkins Supplement Not Supplant**

Funds made available under this Act for career and technical education activities shall supplement, and shall not supplant, non-Federal funds expended to carry out career and technical education activities and tech prep program activities.

### **Title One Supplement Not Supplant 200.xx**

Section 1118(b) of the ESEA, as amended by the ESSA, retains the general requirement that Title I fund supplement and not supplant State and general funds. However, the test for compliance with this requirement has changed in two ways.



First, Section 1118(b) includes a special rule stating that “[n]o [district] shall be required to – (A) identify that an individual cost or service supported under this part is supplemental,” which effectively prohibits a key test previously used to ensure compliance in many Title I schools. Second, the law replaces the two supplement-not-supplant tests (one for targeted assistance schools and one for school-wide program schools) with a single compliance test that focuses on a district’s methodology for allocating State and general funds. Specifically, it requires that a district “demonstrate that the methodology used to allocate State and general funds to each [Title I school] ensures that such school receives all of the State and general funds it would otherwise receive if it were not receiving assistance under [Title I].” A district must meet this requirement not later than two years after the date of enactment of the ESSA — *i.e.*, by December 10, 2017. The ESSA prohibits the Department of Education from prescribing the specific methodology a district must use.

(ii) An LEA may determine the methodology it will use to allocate State and general funds to its schools, provided that the methodology--

(A) Results in the LEA spending an amount of State and general funds per pupil in each Title I school that is equal to or greater than the average amount spent per pupil in non-Title I schools, as reported under Section 1111(h)(1)(C)(x) of the Act; and

(B) Allocates an amount of State and general funds that is sufficient to enable each Title I school to provide-

(2) Districtwide costs or services. To comply with paragraph (a) of this section in allocating State and general funds for districtwide costs or services, an LEA must ensure that each Title I school receives a share of those costs or services equal to or greater than the share it would otherwise receive if it were not a Title I school.

### **(3) Exceptions.**

(i) An LEA may demonstrate compliance with paragraph (b)(1)(ii)(A) of this section districtwide or on a grade-span basis.

### **Supplement, Not Supplant Requirements Specific to Title I, Part A**

For the purposes of determining compliance with the supplement, not supplant requirement in section 1120A(b) and the comparability requirement in section 1120A(c) of P.L. 107-110, an LEA may exclude supplemental state or general funds expended in any school attendance area or school for programs that meet the intent and purpose of Title I, Part A.

### **School-wide Programs**

The supplement, not supplant requirement usually means that federal funds cannot be used to perform a service that would normally be paid for with state or general funds. In a schoolwide program, however, the LEA only needs to demonstrate that the Title I, Part A funding given to each campus is supplemental to what the campus would have received in the absence of Title I, Part A, without considering whether Title I, Part A funding was used to buy an additional service or benefit. An LEA can demonstrate its compliance with this requirement by passing the supplemental funds test.

To pass the supplemental funds test, an LEA must demonstrate that the method it uses to allocate state and general funds to its campuses is applied consistently and does not reduce the allocation of state and general funds to a schoolwide campus because of Title I, Part A funds.

When an LEA passes the supplemental funds test, its campuses can use their funds to improve their entire educational program without having to demonstrate that each expenditure is "supplemental." However, the LEA must maintain documentation that verifies that it passed the supplemental funds test and that it applied the same funding methodology to all of its campuses, including those that do not receive Title I, Part A funds.

### **ECISD Title One Methodology: Supplement not Supplant**

ECISD will apply the flexibility for meeting supplement not supplant on a grade-span basis by how it will allocate state and general non-payroll funds to its Title One School-wide campuses and non-Title One campuses for basic educational programs. Elementary schools will be the only schools served with Title One School-wide funds. The following basic allotment for general funds will be distributed for all elementary school and middle schools to ensure equity of funding:

Basic Allotment using "ADA": Per Pupil (determined through prior year first six weeks ADA)

Total Regular Elementary **\$125**

Other Allotments:

Bilingual/ESL: **\$32**

SPED: **\$21**

Additional Funding (may be supplemented but not decreased)

Short term and PD sub pay: **\$70/** enrolled student

Basic allotments must be used to budget all other general (199) non-salary costs to include supplemental payroll (61xx), contracted services (62xx), supplies and materials (63xx), miscellaneous operating expenses (64xx).

Basic Allotment using "ADA": Per Pupil (determined through prior year first six weeks ADA)

Total Regular Middle School **\$155.00**

Other Allotments:

Bilingual/ESL: **\$32**

SPED: **\$21**

Additional Funding (may be supplemented but not decreased)

Short term and PD sub pay: **\$70/** enrolled student

Basic allotments must be used to budget all other general (199) non-salary costs to include supplemental payroll (61xx), contracted services (62xx), supplies and materials (63xx), miscellaneous operating expenses (64xx).

Basic Allotment using "ADA": Per Pupil (determined through prior year first six weeks ADA)

Total Regular Middle School **\$155.00**

Other Allotments:

Bilingual/ESL: **\$32**

SPED: **\$21**

Additional Funding (may be supplemented but not decreased)

Short term and PD sub pay: **\$70/** enrolled student

Basic allotments must be used to budget all other general (199) non- salary costs to include supplemental payroll (61xx), contracted services (62xx), supplies and materials (63xx), miscellaneous operating expenses (64xx).

In conjunction with funds provided under the Individuals with Disabilities Education Act, services required by law for students with disabilities; and services required by law for English learners, State non-payroll costs for Special Education & Bilingual will be budgeted by the respective departments for supplemental services in compliance with the fund program guidelines. Allocations are planned by program directors and based on individualized student needs according to IEP's & LPAC decisions.

State non-payroll costs for Gifted & Talented will be budgeted by the respective department for supplemental services in compliance with the program guidelines as students are bussed for GT services at various campus site.

Career & Technology is not budgeted at elementary campuses due to state programmatic guidelines.

ECISD will exclude supplemental state, Compensatory Education funds or general funds expended in as it meets the intent and purpose of Title I, Part A.

### **ESSER 3 ARP, TCLAS, & all federal recovery funds**

Funds received under the COVID-19 Recovery Act shall be used in accordance with each recovery fund's provisions to supplement not supplant unless allowable within the individual provision. If not allowable, non-Federal funds that would otherwise be used for activities authorized under this subpart will not be allowed. If allowable, the funds may be used in a manner that supports approved activities within the program plan for allowable purposes within the recovery acts.

### **Comparability Determination**

Ector County ISD will assure comparability is met through the completion and alignment to 1 of the allowable tests provided by Texas Education Agency in accordance with their guidance document, Comparability Computation Form (CCF). This test will utilize the current year budget for current year enrollment as determined most cost effective by the federal programs executive director in the fall of each year. The report will be submitted to TEA (Texas Education Agency) in accordance with their established deadlines.

### **Amendments: All Grants**

- Federal and state grants will be monitored for programmatic and budgetary compliance with the approved NOGA. If it becomes necessary to file an amendment due to a need identified by a campus or program that was not initially approved in the initial award, the amendment will be processed after the supervisor of the director approves the amendment. Funds will become available upon the receipt of approval of the amendment from TEA. Amendments will be required for the following reasons:

- Budgetary moves that are necessary to fulfill the program's intent beyond the 25% allowable move for approved expenditures according to the NOGA.
  - Increase or decrease in the number of the positions approved according to the NOGA.
  - The addition of a capital outlay item that is not currently approved by the NOGA.
  - A programmatic change in activity that is not currently approved by the NOGA, either adding to the current allowable planned activities or taking away from the current planned activities as approved.
- Federal grants will maintain auditable documentation to support programmatic planned/approved expenditures for a period of 5 years after the final expenditures' reports are completed 7 years from the year the grant was NOGA'd.

### Reporting Data: All Grants

- Federal and state programs' executive director will be responsible for assuring the coordination and filing of all programmatic reports for ESSA, ESSER 3 ARP, Compensatory Education, & other grants as assigned.
- Region 18 Education Service Center will be responsible for ensuring the coordination and filing of all programmatic reports for Title One C-Migrant.
- Career & Technical Education executive director will be responsible for ensuring the compliance of all programmatic reports for Carl D. Perkins.
- Executive Director of Special Education will be responsible for ensuring the compliance of all programmatic reports for IDEA-B.
- Principal at DAEP/Youth Center will be responsible for ensuring the compliance of all programmatic reports for Title ID, Subpart 2.
- Executive Director of Federal and State Programs will be responsible for ensuring the compliance of all programmatic reports for Title II, part A.
- Executive Director of Bilingual ESL programs will be responsible for ensuring the compliance of all programmatic reports for Title III, part A & Title III, Immigrant reports & coordination of services with ESC 18 Education Service Center SSA for Title One C- Migrant.
- Finance will be responsible for ensuring the compliance of all expenditure reports relating to all federal and state programs.
- Region 18 Education Service Center will be responsible for compliance of all programmatic & expenditure reports relating to Title One C- Migrant programs.

### Internal Monitoring & Communication: All Grants

**Journal entries/ Position Management-** When changes in positions impact a federal/state program, the appropriate federal program manager/supervisor will initiate assignment changes through the position management system established by the district to approve and track necessary change. When the change necessitates a journal entry, the director of finance will communicate to appropriate finance staff the need for the change. Once the change has been completed, written documentation of the change will be sent to the appropriate federal program manager/supervisor. Communication between the finance executive director, federal & state program supervisors & accounting directors will be ongoing and as needed.

Final meetings will be held in June annually to review all accounts and ensure journal entries necessitated by changes in duties etc. are documented.

The supplemental state allotment expenditure requirements for direct expenditures are as follows for each supplemental state allotment area:

- Special Education 55%
- Compensatory Education 55%
- Bilingual Education 55%
- Dyslexia Allotment 100%
- Career & Technology 55%
- Gifted and Talented Adjusted Allotment 100%
- CCMR Outcomes bonus 55%
- Early Education Allotment 100%
- Regular Program Allotment 100%

The Program Executive Director, and/or program manager monitor for use and appropriateness of charges for the program monthly. The Chief Financial Officer monitors the three-year average spending requirement.

### **IDEA B Maintenance of Effort**

General fund, State Special Educations expenditures must be equal to or greater than per student or in total, in comparison to prior year, or last year of compliance. The Chief Financial Officer and Executive Director of Special Education monitor for compliance in budgeting and at fiscal year-end.

### **Transfer/Removal/Disposal of Purchased Items: All Grants**

All items no longer being used or benefiting students and programs, go through the TEA approval process for transfer/removal/disposal in accordance with the established thresholds provided by TEA.

Forms for this process are downloaded from TEA site, completed by applicable director, signed by Superintendent or designee, and mailed to TEA for approval.

## **Ector County ISD Educational Homeless Plan**

### **Definition of Homelessness (McKinney-Vento Act Sec. 725(2); 42 U.S.C. 11435(2))**

The term “homeless children and youths”

(A) Means individuals who lack a fixed, regular, and adequate nighttime residence...; and

(B) Includes—

- children and youths who are sharing the housing of other persons due to loss of housing, economic hardship, or a similar reason; are living in motels, hotels, trailer parks, or camping grounds due to the lack of alternative accommodations; are living in emergency or transitional shelters; are abandoned in hospitals; or are awaiting foster care placement;
- children and youths who have a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings.

- children and youths who are living in cars, parks, public spaces, abandoned buildings, substandard housing, bus or train stations, or similar settings; and
- Migratory children who qualify as homeless for the purposes of this subtitle because the children are living in circumstances described in clauses (i) through (iii).

### **Title I, Part A, Set-Asides**

The amount of funds to be set aside by ECISD for services to homeless children and youths will be one percent of Title I, Part A. Funds will also be set aside to assist in the transportation needs of foster children.

### **ESSA Requirements for Children and Youth Experiencing Homelessness**

The items which follow are how Ector County ISD complies with Every Student Succeeds Act. Ector County ISD (ECISD) uses Texas Education Agency (TEA) compliance reporting to ensure that it will comply with all homeless student requirements.

Title I of the Elementary and Secondary Education Act, Section 1115(b) (2) (E); .S.C. 6315(b) (2) (E):

Eligibility of Homeless Students for Title I Services

A child or youth who is homeless and is attending any school in the ECISD is automatically eligible for Title I services, regardless of their current academic performance.

McKinney-Vento Homeless Education Assistance Act, Sec. 722 (g); 42 U.S.C. 11432(g):

**POLICIES AND PROCEDURES**

ECISD develops, reviews, and revises our policies to remove barriers to the enrollment and retention of children and youth in homeless situations. Students must enroll in, and have full and equal opportunity to succeed in, the schools of ECISD.

**Policies and Practices against Segregation and Stigmatization**

ECISD has policies and practices to ensure that homeless children and youth are not segregated or stigmatized on the basis of their status as homeless. Schools must not provide services in settings within a school that segregate homeless children and youth from other children and youth, except as is necessary for short periods of time for health and safety emergencies or to provide temporary, special, and supplementary services.

### **NOTIFICATION OF STUDENTS' EDUCATIONAL RIGHTS**

#### **Dissemination of Educational Rights**

The ECISD Homeless Liaison shall ensure that public notice of the educational rights of students in homeless situations is disseminated where children and youth receive services under the Act.

### **LEA HOMELESS LIAISON**

#### **Designation of the Homeless Liaison**

ECISD has designated an appropriate staff person as the ECISD Homeless Liaison for students in homeless situations. The Homeless Liaison for 2022-23 school year is Scott Randolph, Lead Social Worker, ECISD Community Outreach Center, (432) 456-0502.

**Registration of the Liaison**

ECISD has supplied the contact information for the ECISD Homeless Liaison to the Texas Homeless Liaison database.

**Notification of Homeless Liaison**

ECISD informs school personnel, service providers, and advocates who work with families in homeless situations of the duties of the ECISD Homeless Liaison.

**Identifying Homeless Students**

The ECISD Homeless Liaison ensures that children and youth in homeless situations are identified by school personnel and through coordination activities with other entities and agencies. (ENROLLMENT RELATED ISSUES)

**Immediate Enrollment of Students**

ECISD immediately enrolls students in homeless situations, even if they do not have required documents, such as school records, medical records, proof of residency, or other documents. The term “enroll” is defined as attending classes and participating fully in school activities.

**School Selection**

ECISD enrolls a homeless child or youth in any public school that non-homeless students who live in the attendance area in which the child or youth is actually living are eligible to attend, or in their school of origin.

**School of Origin**

ECISD keeps homeless students in their schools of origin, to the extent feasible, unless it is against the parent or guardian’s wishes. Students are permitted to remain in their schools of origin for the duration of their homelessness or until the end of any academic year in which they move into permanent housing. “School of Origin” is defined as the school that the child or youth attended when permanently housed or the school in which the child or youth was last enrolled.

**Transportation**

ECISD provides transportation to the school of origin, at the request of the parent or guardian, or, in the case of an unaccompanied youth, at the request of the district’s homeless liaison. (Title I funds may NOT be used for this purpose.) The ECISD Homeless Liaison ensures that parents and guardians and unaccompanied youth are fully informed of all transportation services, including to the school of origin, and are assisted in accessing transportation services.

**Enrollment of Unaccompanied Youth and Notice of Appeal**

The ECISD Homeless Liaison helps unaccompanied youth choose and enroll in a school, after considering the youths’ wishes, and provide youth with notice of their right to appeal an enrollment decision that is not their choice. The ECISD Homeless Liaison ensures that unaccompanied youth are immediately enrolled in school pending resolution of disputes that might arise over school enrollment or placement.

**Enrollment of Students Pending Resolution of Disputes**

If a dispute arises over school selection or enrollment in a school, the child or youth shall be immediately admitted to the school in which enrollment is sought, pending resolution of the dispute. The child, youth, parent, or guardian shall be referred to the ECISD Homeless Liaison, who shall carry out the dispute

resolution process as expeditiously as possible in accordance with the Enrollment Disputes section of the McKinney-Vento Act after receiving notice of the dispute.

### **Written Explanation of the Denial of School Selection**

ECISD will provide a written explanation of its decision and the right to appeal if a student is sent to a school other than that requested by a parent or guardian, or, in the case of an unaccompanied youth, at the request of the district's homeless liaison. The choice regarding placement shall be made regardless of whether the child or youth lives with the homeless parents or has been temporarily placed elsewhere.

### **Obtaining School Records**

Enrolling schools must obtain school records from the previous school. Students must be enrolled in school while records are obtained.

### **Maintenance of Records**

Any record ordinarily kept by the school, including immunization or medical records, academic records, birth certificates, guardianship records, and evaluations for special services or programs, regarding each homeless child or youth shall be maintained so that the records are available, in a timely fashion, when a child or youth enters a new school or school district; and in a manner consistent with section 444 of the General Education Provisions Act (20 U.S.C. 1232g).

### **Immunizations and Immunization Records**

If the child or youth needs to obtain immunizations, or immunization or medical records, the enrolling school shall immediately refer the parent or guardian of the child or youth to the ECISD Homeless Liaison, who shall assist in obtaining immunizations or immunization or medical records. Students must be enrolled in school in the interim.

## **COORDINATION REQUIREMENTS**

### **Coordination of Services**

ECISD shall coordinate the provision of services with local social services agencies and other agencies or programs providing services to homeless children and youths and their families, including services and programs funded under the Runaway and Homeless Youth Act (42 U.S.C. 12705) to minimize educational disruption for children and youths who become homeless. This coordination shall be designed to ensure that homeless children and youths have access and reasonable proximity to available education and related support services (such as referrals to health, mental health, dental, and other appropriate services), and to raise awareness of school personnel and service providers of the effects of short-term stays in a shelter and other challenges associated with homelessness.

### **Coordination with Housing Agencies**

If applicable, ECISD shall coordinate with State and local housing agencies responsible for developing the comprehensive housing affordability strategy described in section 105 of the Cranston-Gonzalez National Affordable Housing Act (42 U.S.C. 12705) to minimize educational disruption for children and youths who become homeless.

### **Collaboration with THEO and School Personnel**

ECISD Homeless Liaison will collaborate and coordinate with State Coordinators for the Education of



Homeless Children and Youth and community and school personnel responsible for the provision of education and related services to children and youth in homeless situations.

## COMPARABLE SERVICES

### Comparable Services

Each homeless child or youth to be assisted shall be provided services comparable to services offered to other students in the school selected, including transportation services, educational services for which the child or youth meet the eligibility criteria (Title I, Head Start, Even Start, pre-school, educational programs for children with disabilities or for students with limited English proficiency), programs in vocational and technical education, programs for gifted and talented students, and school nutrition programs.

## PARENTAL/GUARDIAN INVOLVEMENT

### Educational and Related Opportunities

ECISD Homeless Liaison will inform parents or guardians of the educational and related opportunities available to their children and provide them with opportunities to participate in their child's education.

## TITLE I, PART A, SET-ASIDES

### ECISD Homeless Education Plan Elements Paid for with Reserved Funds

Even though it is a required part of the ECISD Homeless Education Plan in order to comply with the McKinney- Vento Act, Title I, Part A funds may not be used to support the transportation of homeless students to and from their school of origin. However, it is allowable for LEAs to use Title I, Part A funds to cover the costs of supplemental transportation, such as tutoring or after-school programs.

The following items described in the Homeless Education Plan above will be paid for with funds reserved under Title I, Part A:

Item # 1 Tutoring	Item #5 Homeless Contracted Services
Item # 2 Salaries/Wages Support	Item # 6 Employee Travel
Item # 3 Employee Benefits Budgets (group health insurance, Medicare, Worker Compensation & TRS)	
Item # 4 Teaching Materials & General Supplies	

Amount of funds reserved by ECISD under Title I, Part A for services to children and youth in homeless situations: no less than 1% of ESSA Title One entitlement

## Ector County ISD Migrant Education Program

Ector County ISD has entered into a Shared Service Arrangement with Region 18 to provide all required supplemental services as is noted in the BS 6001 for migrant students. All compliance documentation will be maintained through the educational service center.