

Northgate School District

Book	Policy Manual
Section	600 Finances
Title	Federal Fiscal Compliance
Code	626 Vol III 2025
Status	First and Final Reading
Adopted	August 15, 2016
Prior Revised Dates	9/21/2020

Authority

The Board shall ensure federal funds received by the district are administered in accordance with federal requirements, including but not limited to the federal Uniform Guidance.[1]

The Board shall review and approve all applications for federal funds submitted by the district.

Delegation of Responsibility

The Board designates the Business Manager as the district contact for all federal programs and funding.

The Superintendent or designee, in collaboration with the Federal Programs Coordinator and Business Manager, shall establish and maintain a sound financial management system to include internal controls and federal grant management standards covering the receipt of both direct and state-administered federal grants, and to track costs and expenditures of funds associated with grant awards.[1]

The Superintendent, to assist in the proper administration of federal funds and implementation of this policy, may approve additional procedures as attachments to this policy.

Guidelines

The district's financial management system shall be designed with strong internal controls, a high level of transparency and accountability, and documented procedures to ensure that all financial management system requirements are met.

The district's financial management system is subject to periodic internal and external audits. For any fiscal year in which the district expends \$1,000,000 or more in federal awards, the district is required to have a single or program-specific audit in compliance with federal requirements.[2]

District financial management standards and procedures shall include requirements for the following:

1. Identification – The district must identify, in its accounts, all federal awards received and expended, and the federal programs under which they were received.
2. Financial Reporting – Accurate, current, and complete disclosure of the financial results of each federal award or program must be made in accordance with the financial reporting requirements of **federal regulations**.
3. Accounting Records – The district must maintain records which adequately identify the source and application of funds provided for federally-assisted activities.
4. Internal Controls – Effective control and accountability, including segregation of duties, must be maintained for all funds, real and personal property and other assets. The district must adequately safeguard all such property and **take steps to ensure** that it is used solely for authorized purposes. **Reasonable cybersecurity and other measures must be in place to protect personally identifiable information and other types of information.**
5. Budget Control – Actual expenditures or outlays must be compared with budgeted amounts for each federal award. Procedures shall be developed to establish determination for allowability of costs for federal funds.
6. Cash Management – The district shall maintain written procedures to implement the cash management requirements found in **federal regulations**.
7. Allowability of Costs – The district shall ensure that allowability of all costs charged to each federal award is accurately determined and documented.

Standards of Conduct

The district shall maintain standards of conduct covering conflicts of interest and the actions of employees and school officials engaged in the selection, award and administration of contracts. **[3][4][5]**

All employees shall be informed of conduct that is required for federal fiscal compliance and the disciplinary actions that may be applied for violation of Board policies, rules and procedures.[6]

Employees - Time and Effort Reporting

All district employees paid with federal funds shall document **their** time **working** in support of each federal program, in accordance with law. Time and effort reporting requirements do not apply to contracted individuals.[Z]

District employees shall be reimbursed for travel costs incurred in the course of performing services related to official business as a federal grant recipient.[8]

The district shall establish and maintain employee policies and procedures on hiring, benefits and leave and outside activities, as approved by the Board. District procedures on payment of staff shall apply to employees paid with federal funds and shall include payment in extenuating or emergency conditions, in accordance with applicable law, regulations or emergency declarations by state or federal authorities.[9][10][11][12][13][14][15][16]

Record Keeping

The district shall develop and maintain a Records Management Plan and related Board policy and administrative regulations for the retention, retrieval and disposition of manual and electronic records, including emails.[17][18]

The district shall comply with federal record conversion and quality control review requirements to safeguard the integrity of electronic records.[19]

The district shall ensure the proper maintenance of federal fiscal records documenting:[18][20][21][22]

1. Amount of federal funds.
2. How funds are used.
3. Total cost of each project.
4. Share of total cost of each project provided from other sources.
5. Other records to facilitate an effective audit.
6. Other records to show compliance with federal program requirements.
7. Significant project experiences and results **to:**
 - a. **Determine progress.**
 - b. **Inform periodic review and continuous improvement of project plan.**
 - c. **Revise project objectives, if necessary.**

All records must be retrievable and available for programmatic or financial audit.

The district shall provide the federal awarding agency, Inspectors General, the Comptroller General of the United States, and the pass-through entity, or any of their authorized representatives, the right of access to any documents, papers, or other district records which are pertinent to the federal award. The district shall also permit timely and reasonable access to the district's personnel for the purpose of interview and discussion related to such documents.[23]

Records shall be retained for a minimum of **three (3)** years from the date **of submission of the final financial report**, or as otherwise specified in the requirements of the federal award, unless a written extension is provided by the awarding agency, cognizant agency for audit, oversight agency for audit or cognizant agency for indirect costs.[20]

If any litigation, claim or audit is started before the expiration of the standard record retention period, the records shall be retained until all litigation, claims or audits have been resolved and final action taken.[20]

Records for property and equipment acquired with federal funds shall be retained for three (3) years after final disposition of the property or equipment.[20]

As part of the Records Management Plan, the district shall develop and maintain a records retention schedule, which shall delineate the record retention format, retention period and method of disposal.[18]

The Records Management Plan shall include identification of staff authorized to access records, appropriate training, and preservation measures to protect the integrity of records and data.[18]
[20]

The district shall ensure that all personally identifiable data protected by law or regulations is handled in accordance with the requirements of applicable law, regulations, Board policy.[24][25]
[26][27][28]

Subrecipient Monitoring

In the event that the district awards subgrants, the district shall establish **written** procedures to:[29]

1. Assess the risk of **fraud and** noncompliance.
2. Monitor grant subrecipients to ensure compliance with federal, state, and local laws and Board policy and procedures.
3. Ensure the district's record retention schedule addresses document retention on assessment and monitoring.[18]

Compliance Violations

Employees and contractors involved in federally funded programs and subrecipients shall be made aware that failure to comply with federal law, regulations or terms and conditions of a federal award may result in the federal awarding agency or pass-through entity imposing additional conditions or terminating the award in whole or in part.[30][31]

Mandatory Reporting of Violations

An applicant, recipient or subrecipient of a federal award must promptly disclose whenever, in connection with the federal award (including any related activities or subawards) it has credible evidence of a violation of federal criminal law involving fraud, conflict of interest, bribery or gratuity violations under Title 18 of the United States Code or a violation of the federal civil False Claims Act. The written disclosure must be made to the federal agency, the agency's Office of Inspector General, and pass-through entity (if applicable). Recipients and subrecipients are also required to report issues related to a recipient integrity and performance in accordance with Appendix XII to 2 CFR Part 200. Failure to make required disclosures can result in compliance violations.[32]

Whistleblower Protections

District employees may not be discharged, demoted or otherwise discriminated against as a reprisal for making a protected disclosure of information that the employee reasonably believes to be:[33][34]

1. Evidence of gross mismanagement of a federal contract or grant; or
2. Gross waste of federal funds; or
3. An abuse of authority relating to a federal contract or grant; or
4. A substantial and specific danger to public health or safety; or
5. A violation of law, rule or regulation related to a federal contract, including the competition for or negotiation of a contract or grant.

District employees may disclose such information to any of the following:

1. The Superintendent or designee authorized to investigate, discover or address such misconduct.
2. A federal employee responsible for contract or grant oversight or management of the relevant agency.
3. An authorized official of the United States Department of Justice or other law enforcement agency.

4. **A member of Congress or a representative of a committee of Congress.**
5. **A federal Inspector General.**
6. **The federal Government Accountability Office.**
7. **A court or grand jury, including providing evidence of misconduct in any judicial or administrative proceeding relating to waste, fraud or abuse on a federal contract or grant.**

A district employee who believes that they have been subjected to a reprisal for making a protected disclosure may submit a complaint to the Inspector General of the federal executive agency that is responsible for the relevant federal funding or federal contract. The federal agency and the agency's Inspector General have the authority to investigate such complaints and provide appropriate remedies for substantiated complaints.

The district shall provide written notification to employees of their rights and protections under the Whistleblower Law by posting notices: on the district's website.

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Legal

1. 2 CFR Part 200

2. 2 CFR 200.501

3. 2 CFR 200.318

4. Pol. 827

5. Pol. 828

6. Pol. 317

7. 2 CFR 200.430

8. Pol. 626.1

9. 24 P.S. 1153

10. Pol. 304

11. Pol. 319

12. Pol. 336

13. Pol. 337

14. Pol. 624

15. Pol. 805

16. Pol. 813

Northgate School District

Book	Policy Manual
Section	600 Finances
Title	Travel Reimbursement - Federal Programs
Code	626.1 Vol III 2025
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Authority

The Board shall reimburse administrative, professional and support employees, school officials, **and participants in federal awards** for travel costs incurred in the course of performing services related to official business as a federal grant recipient.[1][2][3]

Definitions

A participant is generally an individual participating in or attending activities under a federal award such as training or conferences, but who is not responsible for implementation of the federal award. Participants can include, but are not limited to, community members, students and conference attendees.[4]

For purposes of this policy, **travel costs** shall mean the expenses for transportation, **airfare**, lodging, subsistence, and related items incurred by **individuals who are traveling on approved** official business as a federal grant recipient.[3]

Delegation of Responsibility

School officials, district employees **and participants** shall comply with applicable Board policies and administrative guidelines established for reimbursement of travel and other expenses.[5][6]

School officials and district employees shall acquire prior written approval to incur travel costs for official business related to a federal award.[3]

The validity of payments for travel **costs shall** be determined by the Business Manager.

Guidelines

Reimbursement for travel costs related to official business as a federal grant recipient must be consistent with standard methods established in general travel reimbursement policies and administrative guidelines.[3][5][6]

Travel costs shall be reimbursed on a mileage basis for travel using a personal vehicle and on an actual cost basis for meals, lodging and other allowable expenses, consistent with those normally allowed in like circumstances in the district's nonfederally funded activities, and in accordance with the district's travel reimbursement policies and administrative guidelines.[3][5][6]

Mileage reimbursements shall be at the rate approved by the Board for other district travel reimbursements. Actual costs for meals, lodging and other allowable expenses shall be reimbursed only to the extent they are reasonable and do not exceed the per diem limits established by the Board.

All travel costs must be presented with an itemized, verified statement prior to reimbursement.
[1][2]

In addition, if these costs are charged directly to the federal award, documentation must be maintained that justifies that:[3][5][6]

1. Participation of the individual is necessary to the federal award.
2. The costs are reasonable and consistent with the district's established policy.

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1. 24 P.S. 516.1

2. 24 P.S. 517

3. 2 CFR 200.475

4. 2 CFR 200.1

5. Pol. 004

6. Pol. 331

Northgate School District

Book	Policy Manual
Section	800 Operations
Title	Conflict of Interest
Code	827 Vol III 2025
Status	First and Final Reading
Adopted	June 20, 2016
Prior Revised Dates	2/20/2017

Purpose

This policy shall affirm standards of conduct established to ensure that Board members and employees avoid potential and actual conflicts of interest, as well as the perception of a conflict of interest.

Definitions

Confidential information shall mean information not obtainable from reviewing a public document or from making inquiry to a publicly available source of information.[1]

Conflict or **Conflict of interest** shall mean use by a Board member or district employee of the authority of his/her office or employment, or any confidential information received through his/her holding public office or employment, for the private pecuniary benefit of him/herself, a member of his/her immediate family or a business with which s/he or a member of his/her immediate family is associated. The term does not include an action having a de minimis economic impact, or which affects to the same degree a class consisting of the general public or a subclass consisting of an industry, occupation or other group which includes the Board member or district employee, a member of his/her immediate family or a business with which s/he or a member of his/her immediate family is associated.[1]

For federal purposes, a conflict of interest includes when the employee, officer, agent, or Board member, any member of their immediate family, their partner, or an organization that employs or is about to employ any of those individuals, has a financial or other interest in or a tangible personal benefit from an entity considered for a contract.[2]

De minimis economic impact shall mean an economic consequence which has an insignificant effect.[1]

Financial interest shall mean any financial interest in a legal entity engaged in business for profit which comprises more than five percent (5%) of the equity of the business or more than five percent (5%) of the assets of the economic interest in indebtedness.[1]

Honorarium shall mean payment made in recognition of published works, appearances, speeches and presentations, and which is not intended as consideration for the value of such services which are nonpublic occupational or professional in nature. The term does not include tokens presented or provided which are of de minimis economic impact.[1]

Immediate family shall mean a parent, parent-in-law, spouse, child, spouse of a child, brother, brother-in-law, sister, sister-in-law, or the domestic partner of a parent, child, brother or sister. [1]

Business partner shall mean a person who, along with another person, plays a significant role in owning, managing, or creating a company in which both individuals have a financial interest in the company.

Delegation of Responsibility

Each employee and Board member shall be responsible to maintain standards of conduct that avoid conflicts of interest. The Board prohibits members of the Board and district employees from engaging in conduct that constitutes a conflict of interest as outlined in this policy.

Guidelines

All Board members and employees shall be provided with a copy of this policy and acknowledge in writing that they have been made aware of it. Additional training shall be provided to designated individuals.

Disclosure of Financial Interests

No Board member shall be allowed to take the oath of office or enter or continue upon his/her duties, nor shall s/he receive compensation from public funds, unless s/he has filed a statement of financial interests as required by law.[3]

The district solicitor and designated district employees shall file a statement of financial interests as required by law and regulations.[4][5]

Standards of Conduct

The district maintains the following standards of conduct covering conflicts of interest and governing the actions of its employees and Board members engaged in the selection, award and administration of contracts.[2]

No employee or Board member may participate in the selection, award or administration of a contract supported by a federal award if s/he has a real or apparent conflict of interest as defined above, as well as any other circumstance in which the employee, Board member, any member of his/her immediate family, his/her business partner, or an organization which employs or is about to employ any of them, has a financial or other interest in or a tangible personal benefit from a firm considered for a contract.[2]

The district shall not enter into any contract with a Board member or employee, or his/her spouse or child, or any business in which the person or his/her spouse or child is associated valued at \$500 or more, nor in which the person or spouse or child or business with which associated is a subcontractor unless the Board has determined it is in the best interests of the district to do so, and the contract has been awarded through an open and public process, including prior public notice and subsequent public disclosure of all proposals considered and contracts awarded. In such a case, the Board member or employee shall not have any supervisory or overall responsibility for the implementation or administration of the contract.[1]

When advertised formal bidding is not required or used, an open and public process shall include at a minimum:

1. Public notice of the intent to contract for goods or services;
2. A reasonable amount of time for potential contractors to consider whether to offer quotes; and
3. Post-award public disclosure of who made bids or quotes and who was chosen.

Any Board member or employee who in the discharge of his/her official duties would be required to vote on a matter that would result in a conflict of interest shall abstain from voting and, prior to the vote being taken, publicly announce and disclose the nature of his/her interest as a public record in a written statement to be attached to the Board minutes.[1]

No **Board member** or **district** employee shall accept an honorarium.[1]

Board members and employees may neither solicit nor accept gratuities, favors or anything of monetary value from contractors or parties to subcontracts, unless the gift is an unsolicited item of nominal value. Gifts of a nominal value may be accepted in accordance with Board policy.[2]
[6]

Improper Influence

No person shall offer or give to a Board member, employee or nominee or candidate for the Board, or a member of his/her immediate family or a business with which s/he is associated, anything of monetary value, including a gift, loan, political contribution, reward or promise of future employment based on the offeror's or donor's understanding that the vote, official action or judgment of the Board member, employee or nominee or candidate for the Board would be influenced thereby.[1]

No Board member, employee or nominee or candidate for the Board shall solicit or accept anything of monetary value, including a gift, loan, political contribution, reward or promise of future employment, based on any understanding of that Board member, employee or nominee or candidate that the vote, official action or judgment of the Board member, employee or nominee or candidate for the Board would be influenced thereby.[1]

Organizational Conflicts

Organizational conflicts of interest may exist when due to the district's relationship with a subsidiary, affiliated or parent organization that is a candidate for award of a contract in connection with federally funded activities, the district may be unable or appear to be unable to be impartial in conducting a procurement action involving a related organization.[2]

In the event of a potential organizational conflict, the potential conflict shall be reviewed by the Superintendent or designee to determine whether it is likely that the district would be unable or appear to be unable to be impartial in making the award. If such a likelihood exists, this shall not disqualify the related organization; however, the following measures shall be applied:

1. The organizational relationship shall be disclosed as part of any notices to potential contractors;
2. Any district employees or officials directly involved in the activities of the related organization are excluded from the selection and award process;
3. A competitive bid, quote or other basis of valuation is considered; and
4. The Board has determined that contracting with the related organization is in the best interests of the program involved.

Reporting Conflicts of Interest

Any perceived conflict of interest that is detected or suspected by any employee or third party shall be reported to the Superintendent. If the Superintendent is the subject of the perceived conflict of interest, the employee or third party shall report the incident to the Board President.

Any perceived conflict of interest of a Board member that is detected or suspected by any employee or third party shall be reported to the Board President. If the Board President is the subject of the perceived conflict of interest, the employee or third party shall report the incident to the Superintendent, who shall report the incident to the solicitor.

No reprisals or retaliation shall occur as a result of good faith reports of conflicts of interest. **The district shall provide written notification of such protections to district employees.**[3]

The Superintendent or designee shall report in writing to the federal awarding agency or pass-through entity any potential conflict of interest related to a federal award, in accordance with federal awarding agency policy.[8]

Investigation

Investigations based on reports of perceived violations of this policy shall comply with state and federal laws and regulations. No person sharing in the potential conflict of interest being investigated shall be involved in conducting the investigation or reviewing its results.

In the event an investigation determines that a violation of this policy has occurred, the violation shall be reported to the federal awarding agency in accordance with that agency's policies.[8]

Disciplinary Actions

If an investigation results in a finding that the complaint is factual and constitutes a violation of this policy, the district shall take prompt, corrective action to ensure that such conduct ceases and will not recur. District staff shall document the corrective action taken and, when not prohibited by law, inform the complainant.

Violations of this policy may result in disciplinary action **for employees** up to and including discharge, fines and possible imprisonment. Disciplinary actions shall be consistent with Board policies, procedures, applicable collective bargaining agreements and state and federal laws.[9]

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Legal

1. 65 Pa. C.S.A. 1101 et seq

2. 2 CFR 200.318

3. Pol. 004

4. 51 PA Code 15.2

5. 65 Pa. C.S.A. 1104

6. Pol. 322

7. 2 CFR 200.217

8. 2 CFR 200.112

9. Pol. 317

Pol. 011

Pol. 319

Pol. 609

Pol. 702