



GRANTS MANUAL

FORT WORTH INDEPENDENT SCHOOL DISTRICT

REVISED JULY 2021

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GENERAL INFORMATION

The *Fort Worth ISD Grants Manual* includes the internal controls and grant management standards used by the Fort Worth Independent School District to ensure that all special revenue funds are lawfully expended. The Grants Manual specifies procedures related to the acquiring, expending, managing, and reporting of grant funds. The district has established fiscal procedures that apply to all financial transactions that relate to federal and state grant compliance, in response to the policies and procedures set forth by federal and state regulations.

In accordance with School Board Policy [BP\(LOCAL\)](#), the Superintendent and administrative staff shall be responsible for developing and enforcing procedures for the operation of the District. These procedures shall constitute the administrative regulations of the District and shall consist of guidelines, handbooks,

manuals, forms, and any other documents defining standard operating procedures. The Superintendent shall approve the *Fort Worth ISD Grants Manual* on an annual basis, or as appropriate, if federal, state or local changes in regulations or policy warrant immediate changes.

All Fort Worth ISD employees who deal with grant funds in any capacity are expected to review this manual to gain familiarity and understanding of the District's rules and practices and to comply with all requirements.

OUR MISSION

Preparing *all* students for success in college, career, and community leadership.

GOAL 1: EARLY LITERACY

Percent of students in Grade 3 reading on or above grade level, as measured by state assessments.

GOAL 2: MIDDLE GRADES MATH

Percent of students who meet or exceed standard on state assessment and EOC exams by the end of 9th grade.

GOAL 3: COLLEGE AND CAREER READINESS

Percent of graduates who have met the criteria for post-secondary readiness, as measured by a college-ready qualifying score on AP, SAT, ACT, TSI, or industry preparation exam.



BUSINESS AND FINANCE DIVISION

The Business and Finance Division will perform multiple roles; however, adequate controls of separation of duties will be maintained at all times. The departments are—

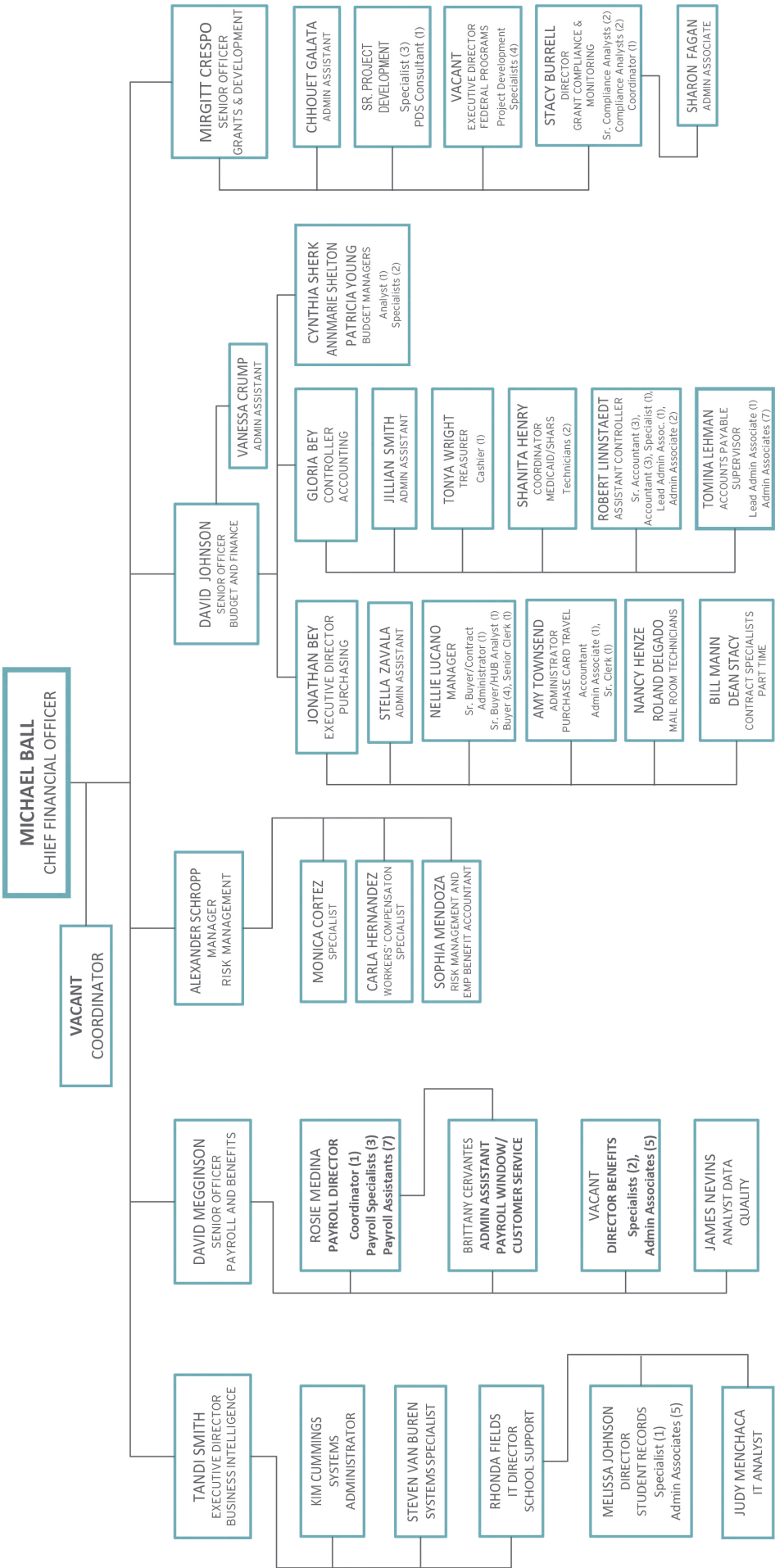
- Application Development
- Benefits
- Budget and Finance
 - Accounting
 - Purchasing
- Compensation and Employee Records
- Discretionary Grants
- Grants and Development
 - Federal Programs
 - Grants Compliance and Monitoring
- Payroll
- Risk Management
- Student Information Systems
- Student Records

All Business and Finance Division staff members shall comply with the:

- Code of Ethics and Standard Practices for Texas Educators [BP DH\(EXHIBIT\)](#)
- School Board Policy [BP CAA\(LOCAL\)](#) regarding fraud
- FWISD Code of Conduct (Employee Handbook)
- Confidentiality Agreement and
- FWISD Acceptable Use Guidelines

The Human Capital Management Department (HCM) is responsible for maintaining up-to-date job descriptions for each staff member. Each staff member should receive and sign a job description annually. Each staff member should receive and sign an evaluation instrument during the annual evaluation process. Changes to job descriptions should be made when substantial changes occur in job duties or responsibilities.

DIVISION OF BUSINESS AND FINANCE ORGANIZATIONAL CHART



DEFINITIONS

Donation – Same as gift.

Fiscal Agent – Person or persons responsible for ensuring compliance with IRS regulations, as well as federal, state, and local 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. Gifts valued at less than \$10,000 need only be reported to G&D. Gifts are maintained in a school's internal finance account.

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

Grant Manager – Department or school with rights to authorize grant expenditures. The Grant Manager may appoint or hire a Project Manager/Coordinator for day-to-day grant implementation.

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).

PDS – Project Development Specialist is assigned to a grant project by G&D and will assist the Grant Manager in monitoring and facilitating the progress of a grant.

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 Managers/Coordinators are responsible for grant implementation and reporting in accordance with grant requirements.

Additional acronyms and definitions related to federal grant management are listed in [EDGAR Subpart A 200.1 through 200.99](#).

GENERAL PROCEDURES

The FWISD Grants and Development Department (G&D) provides information on grant availability and technical assistance to District staff focusing on state and federal governmental sources.

G&D serves as the District clearinghouse for all grant applications and awards. G&D seeks to identify, cultivate, and manage external funding opportunities and provide direction during the proposal development process.



G&D coordinates collaboration in grant activities among District stakeholders, including staff from campuses, departments, and the central office; families; and community partners. G&D provides assistance in obtaining external funding for educational programs of distinction to prepare students for academic achievement and graduation. G&D also encourages and enhances opportunities for faculty and staff to introduce research-based and proven educational programs aligned to District priorities and initiatives.

G&D endorses the Association of Fundraising Professionals (AFP) code of ethics and expects all parties to the grant process to heed these guidelines as well. G&D recognizes their responsibility to ensure that needed resources are vigorously and ethically sought, as well as the responsibility of all parties to adhere to the spirit as well as the letter of all applicable laws and regulations, as recommended by the AFP.

TABLE 1. GENERAL PROCEDURES

RESPONSIBILITY		ACTION
Initiating Department	I.1	<p>A grant can be initiated in two ways:</p> <p>I.2.1 G&D sends out a notice of a grant opportunity and individual schools and departments respond or</p> <p>I.2.2 A school or department notifies G&D that they are applying for a grant by completing the Intent to Apply for Grant Funding form.</p> <p>I.2.3 If a school or department is participating in a partner grant, they must notify G&D by submitting the Intent to Apply for Grant Funding form. If applying for funding through the Education Foundation for Fort Worth Schools, the school or department must also submit the Fiscal Sponsorship Agreement questionnaire.</p>
Reviewing Departments	I.2	File forms with G&D and alert the school or department only if there is cause for denial.
Project Development Specialist	I.3	If assistance from G&D is requested, a Project Development Specialist will follow up with the school or department and assist with an action plan for completion of the grant application.
Initiating Department	I.4	A school or department will be notified by G&D regarding approval or denial of the grant application. If the grant is approved, a GAN/NOGA will be received by G&D and filed with the Budget and Accounting departments. The Budget Department will act as a repository for all documentation and will update the MUNIS Grants Module.
	I.4.1	If the school or department receives the GAN/NOGA first, a copy must be sent to G&D to confirm the terms of the grant. G&D will submit for superintendent or board ratification and develop a Grant Management Team.
	I.5	A Project Development Specialist will help the school or department monitor and facilitate a grant's progress.
	I.5.1	If a school or department submits a grant application without assistance from G&D, then the compliance work is the responsibility of the specific school or department.
	I.5.2	A grant management team and, in some cases, an advisory council will assist with grant implementation and hold regularly scheduled meetings.
Project Development Specialist	I.6	When the grant period ends, a Project Development Specialist will aid in the closing of the grant with the Accounting, Budget and HCM departments.
	I.6.1	If a school or department implemented the grant without the assistance of G&D, grant closeout is the responsibility of the specific school or department.

Board Policy [CB\(LOCAL\)](#) authorizes the

Superintendent to:

1. Apply, on behalf of the Board, for any and all special federal and state grants and awards as deemed appropriate for the District's operations;
2. Approve commitment of District funds for matching, cost sharing, cooperative, or jointly funded projects up to the amounts specifically allowed under the District budget approved by the Board; and
3. Approve grant and award amendments as necessary. The District shall comply with all requirements for state and federal grants and awards imposed by law, the awarding agency, or an applicable pass-through entity. The Superintendent shall develop and enforce financial management systems, internal control procedures, procurement procedures, and other administrative procedures as needed to provide reasonable assurance that the District is complying with requirements for state and federal grants and awards.

Gift recipients are responsible for making sure the [Donation Acknowledgment form](#), which works as a tax deduction receipt for funds donated for public use, is completed and given to the appropriate persons. This report shall be prepared by the principal and given to any donor of cash. A copy of the form should be filed with the cash receipt for the donation. For donations of fixed assets, this form should be forwarded to the CFO for signature and shall be returned for the principal to give to the donor. In addition, grant managers should write a thank-you note to all donors in a timely manner. The thank-you note should detail how the money will be spent, if not previously specified.

TABLE 2. PROCEDURES FOR REPORTING AND ACCOUNTING FOR MONETARY GIFTS, GRANTS, AND DONATIONS

Amount	Action/Approval	Budget
≤ \$10,000	Report to G&D using the Intent to Apply for Grant Funding form or the Donation Acknowledgment form . Principal or department head must approve.	Gift or donation may be kept in internal finance account. Grant must be presented to the Budget Department to establish a centralized District account.
\$10,001 – \$24,999	Report to G&D using the Intent to Apply for Grant Funding form or the Donation Acknowledgment form . Superintendent must approve.	Gift, grant, or donation must be presented to the Budget Department to establish a centralized District account.
≥ \$25,000	Report to G&D using the Intent to Apply for Grant Funding form or the Donation Acknowledgment form . Board must be notified.	Gift, grant, or donation must be presented to the Budget Department to establish a centralized District account.



**GRANT DEVELOPMENT AND
MANAGEMENT PROCESS**

Compliance with all federal and state grant requirements is essential to ensure that all granted funds remain with the District. Failure to comply with grant requirements may result in denial of reimbursement requests and/or requests from the granting agency to return a portion of, or in some cases all, grant funds.

At the District level, managing state and federal grants shall be a collaborative process between the G&D, Accounting, Budget, Purchasing, Payroll, and HCM departments. Each department is responsible for their duties and responsibilities as they relate to the management of state and/or federal grants.

Grants and gifts provide a significant additional resource to FWISD, supplementing the property tax revenue and state funding that provide the bulk of the District's financial resources. In general terms, all grants are handled in the same way, with additional

steps added to the process to account for variances in size, scope, and complexity of either the grant application or the management process.

Grants come in various forms, with a single recipient, multiple recipients, or district-wide recipients. The management and allocation of grant funds and benefits to multiple departments and campuses increases the complexity of grant programs. Federal entitlement grants require additional processing and management steps in order to ensure compliance with federal regulations.

The roles of various FWISD departments and entities are defined in the following chart to assist with grant implementation according to funding agency requirements and accepted fiscal management procedures.

Each department is responsible for training their own staff and staff from other departments, as appropriate, regarding specific grant management duties and responsibilities.

TABLE 3. UNDERSTANDING THE GRANT DEVELOPMENT AND MANAGEMENT PROCESS

	STEP 1: PRE-GRANT ACTIVITIES	STEP 2: APPLICATION DEVELOPMENT AND SUBMISSION	STEP 3: GRANT IMPLEMENTATION	STEP 4: GRANT REPORTING AND GRANT CLOSING
GRANTS AND DEVELOPMENT (G&D)	<ol style="list-style-type: none"> 1. Review grant options and identify opportunities 2. Notify appropriate administrators and campuses regarding grants 3. Assist with submission of Intent to Apply for Grant Funding Form 4. If required, notify private schools of grant application 	<ol style="list-style-type: none"> 1. Develop and conduct grant planning team meetings 2. Submit grant proposal 	<ol style="list-style-type: none"> 1. If grant is not awarded, request reviewer score sheets and review for future requests 2. Upon receipt of Grant Award Notice (GAN/NOGA) develop grant management team 3. Assign Project Development Specialist (PDS) for grant and assist Grant Manager with budget set up and monitoring process 4. Develop Grant Advisory Group and plan first meeting 5. Review process for grant implementation and management with Grant Manager 6. Assist with process of grant project staffing 7. Monitor expenditures for alignment to grant budget and objectives 	<ol style="list-style-type: none"> 1. Assist with preparation and submission of project reports 2. Assist with processes for project documentation, including time and effort reports and on-site data collection 3. Facilitate grant close-out process, including assistance with final report and documentation collection/review
DISTRICT LEADERSHIP	<ol style="list-style-type: none"> 1. Maintain District strategic plans, goals and objectives 2. Recommend priority campuses, departments or projects for grants 3. Submit or review Intent to Apply for Grant Funding Form 4. Provide public notice of Intent to Apply 	<ol style="list-style-type: none"> 1. Advise at planning meetings 2. Assist with project development 3. Approve application submission 	<ol style="list-style-type: none"> 1. Assign management staff and Grant Manager for the team 2. Approve budget set-up and establish in-department monitoring process 3. Assign management staff and recruit community leaders for group 4. Notify stakeholders of grant and establish implementation team 5. Prepare job descriptions for grant staff and arrange for posting or assignment of duties to existing staff 6. Submit and approve PO requests aligned to grant budget 7. Assist with preparation of budget amendments 	<ol style="list-style-type: none"> 1. Provide information as needed for project reports 2. Provide time and effort forms and certifications for all grant staff; and approve campus records in alignment with grant budget and project guidelines 3. Assist with collection of data and information needed for final report 4. Document grant and personnel assignments
CAMPUS LEADERSHIP	<ol style="list-style-type: none"> 1. Maintain Campus Improvement Plan (CIP) and Priorities identified during the Comprehensive Needs Assessment 2. Review grant options with Campus Leadership and parents 3. Submit Intent to Apply for Grant Funding Form 4. Notify campus leaders of grant opportunity and obtain input 	<ol style="list-style-type: none"> 1. Advise at planning meetings 2. Assist with project development 	<ol style="list-style-type: none"> 1. Assign management and project staff for team 2. Approve budget set-up and establish on-campus monitoring process 3. Assign management staff and recruit students, parents, faculty, and community leaders for group 4. Notify stakeholders of grant and establish implementation team 5. Prepare job descriptions for grant staff and arrange for posting or assignment of duties to existing staff 6. Submit and approve PO requests aligned to grant budget 7. Assist with preparation of budget amendments 	<ol style="list-style-type: none"> 1. Provide information as needed for project reports 2. Collect time and effort forms and certify for all grant staff 3. Ensure alignment with grant budget and project guidelines 4. Assist with collection of data and information needed for final report

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TABLE 3. UNDERSTANDING THE GRANT DEVELOPMENT AND MANAGEMENT PROCESS (CONTINUED)

	STEP 1: PRE-GRANT ACTIVITIES	STEP 2: APPLICATION DEVELOPMENT AND SUBMISSION	STEP 3: GRANT IMPLEMENTATION	STEP 4: GRANT REPORTING AND GRANT CLOSING
BUDGET AND FINANCE DIVISION	1. Review Intent to Apply for Grant Funding Form for budget impact	1. Advise at planning meetings 2. Align project budget and match to District 3. Review project budget impact	1. Upon receipt of GAN/NOGA, assign grant account number 2. Review budget for alignment to GAN/NOGA and approve project budget 3. Ensure compliance with the FASRG in coding all payroll and non-payroll expenditures 4. Prepare and post the initial budget and all amendments to the general ledger 5. Provide assistance to the team as needed 6. Review alignment of payroll plan with grant budget 7. Assist HCM with determining the payroll distribution codes for all grant-funded staff 8. Monitor the spending thresholds throughout the grant period 8. Assist with preparation of budget amendment reports	1. Prepare timeline for all grant-related financial reports (monthly, quarterly, and annual) 2. Provide financial data for project reports 3. Ensure that payroll reflects time and effort forms and aligns to budget 4. Maintain matching funds alignment when required by grant 5. Provide data on open PO's to ensure receipt of goods and services before grant end date 6. Provide financial data for final report 7. Retain all financial records for the required length of time (7 years) for audit purposes
GRANTS COMPLIANCE AND MONITORING		1. Provide needs assessment data 2. Develop evaluation plan	1. Upon receipt of GAN/NOGA, assign evaluator to grant 2. Approve research and evaluation budget assignments 3. Provide input and data review for team 4. Establish timeline with Grant Manager for data instruments and collection 5. Conduct project assessments, compile data, and prepare project reports for submission to grantor	1. Complete final report 2. Submit to funder and stakeholders 3. Retain all records for the required length of time (7 years) for audit purposes
HUMAN CAPITAL MANAGEMENT (HCM)		1. Assist the Grant Manager with determining the position title, Role ID, and other salary information for use in completing the grant application	1. Review job description 2. Assist the Grant Manager with the recruitment and hiring of all grant-funded staff through job posting, screening, and processing	1. Collect time and effort forms and certify for all evaluation staff 2. Ensure that all grant-funded staff have a job description with the grant-related duties and funding

GRANT PROCEDURES

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

1. The District has established a conflict of interest policy for all federal grant awards and shall disclose in writing any potential conflict of interest to the granting agency [CAA\(LOCAL\)](#). The same conflict of interest questionnaire that is used for other District functions will be used for compliance with this provision. In the event a conflict of interest occurs the [Local Government Officer Conflicts Disclosure Statement \(Form CIS\)](#) will be completed by the staff involved in the conflict and handled following the same procedures outlined in [Local Government Code Chapter 176](#). Conflicts of interest, if any, will be reported to the granting agency. The Records Management Administrator will be responsible for overseeing and collecting the conflict of interest questionnaires.
2. The District will comply with all additional conflict of interest requirements required by the federal granting agency and/or the pass-through entity (TEA).
3. The District will disclose in writing to the granting agency and/or pass-through entities any violations of federal criminal law including fraud, bribery or gratuity violations affecting a federal grant award. Upon detection of any fraud, abuse or waste with federal grant funds, the District will promptly notify the proper legal authorities and pursue appropriate criminal and/or civil actions. In addition, the District will report to the granting agency and pass-through entity the extent of the fraud or violations. The District will reclassify fraudulent expenditures made with federal grant awards to local District funds (i.e., the General Fund). The Senior Officer of Grants and Development will be responsible for overseeing, reporting and documenting any fraud, abuse or waste of federal grant funds.

All District employees are prohibited from soliciting gifts or tokens from vendors or other parties who

are affected by (or have an interest in) a federal grant award. In addition, all District employees are prohibited from accepting unsolicited gifts or tokens from vendors or other parties who are affected by (or have an interest in) a federal grant award that exceed a nominal (individual) value of \$25.00 (the IRS business gift limit) and an aggregate value of \$50.00 (the current Conflict of Interest limit) or less in a fiscal year. The unsolicited gifts or tokens may not include the following:

- Items prohibited at public elementary and secondary schools such as drugs, tobacco or alcohol products.

In addition, all employees will comply with the Educators' Code of Ethics. Violators of the Code of Ethics will be subject to disciplinary action, including but not limited to termination of employment with the District.

District employees who violate this administrative directive will be subject to disciplinary action, up to and including termination of employment with the District. Violations that exceed the federal Conflict of Interest thresholds will be reported to the federal granting agency and/or pass-through entity by the Senior Officer of Grants and Development.



GRANT APPLICATION PROCESS

The District may be eligible to apply for entitlement or competitive federal grant funds. All applications and amendments to any funding agency must be submitted through the Senior Officer of Grants and Development. Program and project budgets may be amended as allowed by the funding source. Approval for submitting applications is received from members of the FWISD Leadership team, and approved applications are signed by the Superintendent or designated assignee prior to submission.

Federal entitlement grant funds include, but are not limited to, Elementary and Secondary School Emergency Relief (ESSER I, II, and III), Every Student Succeeds Act (ESSA), Individuals with Disabilities Education Act (IDEA), and Carl D. Perkins. The maximum and/or final entitlement awards for the District are posted on the TEA Grants Management webpage: <http://tea.texas.gov/index4.aspx?id=5040>. The Senior Officer of Grants and Development will obtain entitlement amounts and begin the grant development process with the appropriate stakeholders, adhering to all requirements for public feedback.

G&D will obtain competitive grant information to determine whether these grants are appropriate for the District. Some competitive grants may have matching funds and/or in-kind payment requirements that could place a burden on the District's available financial resources.

All grant applications that support student instruction at one or more campuses must be developed in collaboration with the principals of those campuses. Specific grant activities to support the academic program at a campus should be documented in the Campus Improvement Plan (CIP). The final approval of a grant application shall be by Superintendent or other authorized official.

BUDGETING GRANT FUNDS

The grant budget must be based on the proposed activities planned and described in the grant application. Prior to developing the budget, the Grant Manager must know the intent of the federal program and the activities that are allowable to be conducted with grant funds. During planning

meetings, the Grant Manager and other staff, as appropriate, will conduct a comprehensive needs analysis using the applicable data to determine the goals, objectives, and activities for the program that will be implemented to accomplish the District goals and objectives. The Budget Department has a defined district-wide process that will support efficiency and collaboration between funding sources, maximizing the use and coordination of funds.

- District Leadership is responsible for developing a District-wide Comprehensive Needs Assessment (CNA) through a process that includes reviewing program evaluations, implementation outcomes, and prior budgets.
- District Leadership works with cabinet-level staff and with the Director of Grants Compliance and Monitoring to analyze District needs utilizing data from prior school years. The proposed District Improvement Plan (DIP) is updated, reviewed, and approved by the Superintendent and cabinet, and targeted priority initiatives for the District are finalized.
- District Leadership ensures alignment with the Strategic Plan and DIP by meeting regularly to:
 - o Align program objectives and activities with grant guidelines and District policy
 - o Review needs assessment data
 - o Coordinate resources across funding streams
 - o Support budget development
 - o Monitor expenditures
 - o Provide program management
 - o Disseminate program information to stakeholders
 - o Review compliance reporting
- Assessments of educational outcomes are conducted in all content areas. Timely interventions are directed toward low-achieving students.
- Campuses have ongoing access to budget reports through MUNIS.
- Budget, Accounting, and G&D staff meet regularly with campus staff for monitoring, analysis, and training. Where appropriate, grant strategic committees conduct meetings

FWISD BUDGET PLANNING TIMELINE

JULY	<ul style="list-style-type: none"> Title I budgets for the new school year become active.
AUGUST THROUGH SEPTEMBER	<ul style="list-style-type: none"> Campuses establish fourteen-member SBDM teams, which will meet throughout the year to plan and conduct action as needed. Grants Department uploads approved CIPs for FWISD Board of Education approval. Grant-funded employees sign job descriptions.
OCTOBER	<ul style="list-style-type: none"> Grants Department monitors Title I payroll expenditures. Board of Education approves CIPs. At least 25% of Title I funds should be spent by the end of October.
NOVEMBER	<ul style="list-style-type: none"> CIPs are reviewed and updated.
DECEMBER	<ul style="list-style-type: none"> Title I grant budget revisions are due. At least 60% of Title I funds should be spent before the winter break.
JANUARY	<ul style="list-style-type: none"> Title I library book and technology requisitions are due. Principals initiate CNA process. Campuses review and update CIPs. Grant-funded employees certify time and effort.
FEBRUARY	<ul style="list-style-type: none"> CNA process continues. Principals receive notification of Title I preliminary allocations.
MARCH	<ul style="list-style-type: none"> SBDM teams meet to review Title I documents (CNA, family engagement policy, parent compact, professional development plan for teachers). Principals complete CNA. Principals notify Federal Programs regarding position non-renewal. At least 85% of Title I funds should be spent by the end of March.
APRIL	<ul style="list-style-type: none"> Principals enter next year's Title I budget, with alignment to CNA. Title I requisitions must be submitted by the end of April.
MAY	<ul style="list-style-type: none"> Principals submit CIP draft for the following school year. At least 90% of Title I funds should be spent by the end of May. Grant-funded employees certify time and effort.

with parents and other stakeholders to explain campus services and activities that are supported with grant funding.

NOGAs are provided to the Budget Department so that budget accounts may be established. The Budget Department budgets grant funds in the appropriate fund code as authorized by the [Financial](#)



[Accountability System Resource Guide](#) or the granting agency. In addition, the object expenditure codes noted on the grant application will be consistent with the budgeted account codes.

The Budget Department is responsible for the initial grant set-up and receives all approved NOGAs and grant award letters. The Budget Department creates and stores a file for each grant received. The Budget Department is responsible for the creation of a budget for each grant awarded. Only the Budget Department can generate a revenue or expenditure code. The Budget Department enters all budget codes and amounts into the District's financial management system (MUNIS). The Budget Department assigns a unique five-digit project code to each grant received.

Federal grant funds will be budgeted and available for use in a timely manner after receipt of the NOGA or from the stamp-in date.

Budget amendments, if any, shall be reviewed and

approved by G&D to ensure that the reclassification of funds is allowable under the grant management guidelines related to budget amendments. Some grants allow a transfer of funds, but only if the new object code does not require specific approval from the granting agency. Budget amendments are entered into the District's financial management system by the Budget Department.

The District follows TEA's [When to Amend the Application](#) guidance for grants administered by TEA. The guidance applies to both federal and state grants.

The Grant Manager will monitor the need for amendments at least quarterly throughout the grant period and at least one month prior to the grant amendment deadline, if applicable. If an amendment is necessary for any of the reasons specified by the pass-through entity (TEA) or in federal regulations, the Grant Manager will request the amendment, and staff from G&D will initiate and collaborate with the Budget Department prior to submission of the grant amendment. The grant amendment approval process will be the same as the grant application approval process.

The Budget Department shall be responsible for ensuring that the finance system budget corresponds to the most recent grant NOGA.

G&D coordinates and collaborates with the Budget Department to ensure that all grant budgets are completed using the correct account code structure (as appropriate) and that the District's purchasing, travel, and other procedures are adequately documented if prior approval is required by the granting agency or pass-through entity (TEA).

G&D coordinates and obtains pre-approval for the following activities, which have been identified by the granting agency or pass-through entity (TEA):

- Student field trips
- Hosting conferences
- Out-of-state travel

Grants that require matching or in-kind District contributions are evaluated for overall impact on current and future District local funds.

No federal grant funds will be budgeted,

encumbered, or spent until:

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

No pre-award expenses will be made by the District prior to the approval of the federal granting agency or pass-through entity, unless otherwise authorized by the agency statutes or grant guidelines. Unauthorized pre-award expenses, if any, will be paid from local District funds (i.e., the General Fund).

The Budget Department will notify G&D when the funds have been budgeted and are accessible in the general ledger for expenditure by the appropriate campus or department.

COST SHARING OR MATCHING FUNDS

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

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

All staff paid with cost sharing and matching funds will be subject to time and effort documentation requirements.

Cost sharing and matching funds that are donated services or supplies will be recorded and tracked in accordance with federal regulations (CFR 200.306).

PROGRAM MANAGEMENT

Upon receipt of the Grant Award Notice (GAN) or Notice of Grant Award (NOGA) from the grantor, G&D coordinates with the Grant Manager to identify

the key stakeholders for the project who will serve on the grant management team.

The Grant Manager is responsible for supervising the execution of assigned grant programs and monitoring expenditures for compliance with state and federal guidelines. This responsibility is supported by staff from G&D, Budget, and Accounting, as well as by District Leadership from Curriculum and Instruction, School Leadership, Education Technology, and Student Support Services.

A list of all federal grant awards shall be maintained in the MUNIS Project Accounting Module by the Budget Department, to include all EDGAR-required data (denoted with an *) and District-required information listed below:

- The CFDA title and number*
- Federal award identification number and year*
- Name of the federal agency*
- Name of the pass-through entity, * if any
- Grant Manager for each grant
- Subgrants, if any
- TEA-assigned risk level for each grant, as appropriate.

On at least a monthly basis, staff from G&D will review the status of each federal grant fund. The review will include a comparison of budget to expenditures.

The District's financial management system (MUNIS) shall be used to store, maintain, and report all required federal grant information. Consequently, the District shall ensure that access to the data is restricted to authorized individuals in accordance with the District's Data Security and Access policies. In addition, the District shall retain all federal grant records for a period of seven years in accordance with the District's Local Records Retention Plan.

The District's records management officer shall be responsible for ensuring that all grant-related records are retained, stored, and accessible, as appropriate.

FINANCIAL MANAGEMENT

The District's financial management system (MUNIS) will be used to expend and track all federal grant expenditures. The financial management system will be maintained in a manner that provides adequate internal controls over the data integrity, security and accuracy of the financial data.

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

The Grant Manager, with support from the Budget and Accounting departments, is responsible for monitoring expenditures and staying within the framework of approved grant expenditures during the grant period. G&D shall provide project management support and tools to the Grant Manager and other District and campus staff, as requested. Information is also readily available via MUNIS reports.

PERIOD OF PERFORMANCE (OBLIGATIONS)

All allowable grant expenditures shall be incurred during the grant period (i.e., from the begin date through the end date of the grant award, as designated on the NOGA/GAN). The Grant Manager will notify the appropriate departments (such as Purchasing, HCM, Budget, Accounting, and Payroll) of the grant periods for each federal grant award to ensure compliance as noted below:

- No employee will be hired and paid from grant funds except during the grant period.
- No purchase obligation will be made from grant funds except during the grant period.
- No payroll or non-payroll expenditure will be made from grant funds except during the grant period.

All obligations with federal grant funds must occur during the grant period. Obligations that occur before or after the grant period are not allowable costs. The obligations must be liquidated in accordance with the grant deadlines, especially as they relate to the final drawdown of federal grant funds. Guidance regarding the obligation of federal grant funds can be found in [TEA's General and Fiscal Guidelines](#).

The Grant Manager will monitor the expenditures during the grant period to ensure that the funds are spent in a systematic and timely manner to accomplish the grant purpose and activities.

EXPENDITURE OF GRANT FUNDS

Expenditure of grant funds shall be through the Purchasing, Accounting or Payroll/Compensation Department processes in place for non-grant funds but will have additional requirements as noted below to ensure full compliance with federal cost principles.

COST PRINCIPLES

All grant expenditures must be allowable under the Federal Cost Principles (2 CFR 200, Subpart E), the grant application program assurances, the granting agency's policies, and District policies and procedures. District costs generally fall under two major categories: 1) compensation and benefits and 2) non-compensation (contracted services, supplies, travel, or equipment).

The District shall adhere to the Cost Principles for federal grants (EDGAR Subpart E) and any additional grant-specific cost principles. The general principles of EDGAR state that costs must:

- Be reasonable and necessary:
 - o 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.
 - o Necessary is defined as costs needed to carry out the grant activities.
- Be allocable to federal awards.
- Be authorized or not prohibited under state or local laws or regulations.

- Conform to any limitations or exclusions set forth in these principles, federal laws, terms and conditions of the federal award, or other governing regulations as to types or amounts of cost items.
- Be consistent with policies, regulations, and procedures that apply uniformly to both federal awards and other activities of the governmental unit.
- Be accorded consistent treatment. A cost may not be assigned to a federal award as a direct cost if any other cost incurred for the same purpose in like circumstances has been allocated to the federal award as an indirect cost.
- Except as otherwise provided for in EDGAR, be determined in accordance with generally accepted accounting principles.
- Not be included as a cost or used to meet cost-sharing or matching requirements of any other federal award in either the current or a prior period, except as specifically provided by federal law or regulation.
- Be the net of all applicable credits.
- Be adequately documented.

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

An indirect (F&A) cost rate, whether submitted to a federal cognizant agency for indirect costs or maintained on file by the District, must be certified by the District using the Certificate of Cost Allocation Plan or Certificate of Indirect Costs. The certificate must be signed on behalf of the District by the CFO.

All District costs with federal grant funds, whether direct or indirect, will meet the minimum requirements of allowability as specified in 2 CFR 200.403. In addition, the costs must meet the general provisions for selected items of cost (2 CFR 200.420). The general cost allowability rules for specific items of cost listed within these procedures shall apply to all grant funds, unless more restrictive



allowability rules are required by a particular grant award. Specific items not listed within these procedures will be evaluated by staff in the G&D and Budget departments on a case-by-case basis for allowability. **The District shall adhere to the more restrictive allowability rules when a conflict arises between the general allowability rules, the program-specific allowability rules, and the District's allowability rules.**

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

The District shall adhere to TEA's Guidelines Related to Specific Costs, as published to the TEA website. G&D staff attend TEA training at least once per year and use the information obtained to create, publish, and update FWISD-specific guides. G&D staff provide these guides and other resources to campus and department staff during grant management meetings and G&D-led trainings; in addition, the resources are posted on the G&D SharePoint. When local guidelines related to unallowable costs with federal grant funds are more restrictive than federal or state regulations, the District's local guidelines shall be followed. Specific unallowable costs are noted below.

Unallowable Costs

- Unhealthy snacks
- Meals
- Educational field trips to an amusement park
- Consultant fees in excess of \$2,500 per day
- Incentives and awards in excess of \$10 per item

COMPENSATION COSTS

All payroll expenditures shall be paid in accordance with the grant cost principles. First and foremost, payroll expenditures must be authorized on the grant application and the duties assigned must be directly related to grant activities.

In addition, compensation costs will be allowable if:

- The costs are reasonable for the services

rendered and conform to the established District compensation and benefit plans for expenditures with all other funds (i.e., local funds);

- The employees have been employed in accordance with the District's established hiring procedures; and
- The costs are supported by the appropriate timekeeping, absence tracking, time and effort certification, or other documentation, as appropriate.

Employees in federally funded positions shall report all outside employment or professional services rendered to other entities. External employment and/or professional services shall not conflict with the federally funded activities with the District.

Incentive compensation, such as stipends, awards, early resignation incentives, and attendance incentives, shall be in accordance with the District's written plans for each of these incentives.

Stipend compensation for other non-federal grant award duties will be supported by a Supplemental Duties Job Description. Additional duties shall not conflict with the federally funded activities with the District.

BENEFIT COSTS

District costs for fringe benefits for grant-funded staff will be allowable as noted below:



- All benefit costs shall be in accordance with the District's written Summary of Employee Benefits.
- All leave benefits shall be in accordance with the District's written Leaves and Absences Policy [DEC\(LOCAL\)](#).
- The benefit costs shall be distributed equitably at the same allocation rate (percentage) as the base compensation.
- The benefit costs shall be earned and paid during the grant period.
- All benefit costs must be allowable under the Internal Revenue Service Fringe Benefits Guide (as subjected to taxes, as required by federal statute).
- Supplemental duties, if any, shall be supported by a Supplemental Duties Job Description/Pay Notice
- Absence records, if any
- Time and effort documentation, as appropriate (signed job description, semiannual certification, periodic time and effort, or the substitute system for time and effort).

Non-Exempt Staff

- Employment agreement, contract, or reasonable assurance, as appropriate
- Job description signed by the employee with language similar to: *Funded by Title I, Part A with the primary purpose of supporting grant activities aimed at improving academic achievement for students struggling to meet state standards.*
- Absence records, if any
- Time and effort documentation, as appropriate (signed job description, semiannual certification, periodic time and effort, or the substitute system for time and effort)
- Timekeeping records (actual work hours per workweek) in accordance with the FLSA and the District's timekeeping procedures.

Position Control and the Grant Manager will ensure that the role ID and object codes reflected on the grant application (Payroll Summary) are consistent with HCM, Payroll, Accounting, and PEIMS records.

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

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

DOCUMENTATION OF COMPENSATION AND BENEFIT COSTS

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

Exempt Staff

- Employment agreement, contract, or reasonable assurance, as appropriate
- Job description signed by the employee with language similar to: *Funded by Title I, Part A, with the primary purpose of supporting grant activities aimed at improving academic achievement for students struggling to meet state standards.*

SELECTION OF GRANT-FUNDED STAFF

The Grants Manager will collaborate with the appropriate campus and departmental stakeholders to identify all staff needed to accomplish grant activities. The Grant Manager will collaborate with Compensation and Position Control to obtain estimated salaries for proposed grant-funded staff prior to the completion of the grant application. The Grant Manager will provide a copy of the Payroll Summary of each grant program to each of the campuses and departments noted above upon approval of the grant application.

Approving payroll expenditures from grant funds shall be a collaborative process involving the following entities: the campus or department, HCM, G&D, Budget, Accounting, and Payroll. Each campus and department plays an essential role in ensuring that all federal grant requirements are met.

The FWISD Compensation Manual shall be used to determine compensation for all District staff, whether paid from local, state, or federal grant funds. In addition, the District will provide the same employer-provided benefits for all District staff, whether paid from local, state, or federal grant funds.

The compensation for grant-funded staff will be allocated to the respective grant program (fund) based on the single and/or multiple cost objectives performed by the grant-funded staff. If a grant-funded staff member performs non-grant activities during the day or beyond the normal workday, the compensation for the non-grant activities will be paid from non-grant funds. Grant-funded staff with more than one cost objective will comply with the time and effort documentation requirements. Incentive payments for grant-funded staff will be allowable with federal grant funds if based on the same criteria as for non-federal grant-funded staff.

New Positions

New grant-funded positions will be created only when a job description has been developed and approved by the Compensation Department, the Chief of the department responsible, if applicable, and the Grant Manager. The Grant Manager will ensure that the position is approved on the grant

application and that adequate funds exist to fill the position. The Budget and Payroll departments will be notified to ensure that the position is budgeted on the general ledger and the position is paid using the correct payroll account distribution codes.

New Hires

When a position and the funding are both available, new staff will be hired to fill positions that are wholly or partially funded with federal grant funds. Upon separation of an employee, the home campus or department will initiate a request to fill the position through the FWISD hiring process.

The Grant Manager will review the request to ensure that the position is authorized and necessary. Changes to the job description, if any, will be submitted, reviewed, and authorized by the Compensation Department. The Budget and Position Control departments will review the request to ensure that the position is created and that adequate funds exist in the appropriate account codes. After approval from the Grant Manager and Budget Department, HCM will advertise the position.

The screening and selection process will include a review to ensure that the recommended applicant is highly qualified and meets any other grant-specific requirements.

Upon employment, the new hire will receive and sign a copy of the job description, which will include the grant funding source. The new hire will receive and sign a written notification stating that the grant funding will cease and the position will lapse at the end of the grant.

Transfer of Personnel

When an employee in a grant-funded position is recommended for transfer to another campus, department, or assignment, the Grant Manager will collaborate with the HCM and Budget departments to ensure that the appropriate staff allocations and funding changes are made at the time of the transfer. The home campus or department will initiate the transfer request, especially if it is a teaching assignment change at a campus. The Grant Manager and the HCM and Budget departments will evaluate the transfer to ensure that the staff allocations, highly

qualified staff requirements, and funding source changes comply with grant requirements.

Substitute Teachers

Salary expenditures for substitute teachers are allowable for approved teacher positions. The Budget and Payroll departments will ensure that the expenditures for substitute teacher costs are budgeted and expensed from the appropriate account codes. The School Board approved substitute pay scale will be used to compensate all substitute teachers, whether paid from local, state, or federal grant funds.

Stipends and Extra Duty Pay

Stipend and extra duty pay expenditures are allowable for authorized and approved activities. A schedule or work log shall be maintained to substantiate the stipend or extra duty pay. A job description for each stipend role will include the duties related to the grant purpose and the grant funding source. The School Board approved stipend and extra duty pay schedule will be used to compensate all teachers whether paid from local, state, or federal grant funds. The Budget and Accounting departments shall ensure that expenditures for stipend and extra duty pay are budgeted and expensed from the appropriate account codes.

TIME AND EFFORT DOCUMENTATION

District staff funded wholly or partially with federal grant funds will comply with federal guidelines related to time and effort. Grant-funded staff, their immediate supervisors, the Grant Manager, and the HCM, Budget, and Accounting departments will comply with federal guidelines related to time and effort documentation. The District will collect and monitor time and effort documentation for District employees only. Time and effort documentation does not apply to independent contractors.

The following requirements will apply to all District staff funded wholly or partially from federal grant funds, including staff funded through non-federal grant funds as part of a cost sharing or matching requirement.

SEMIANNUAL CERTIFICATION

The District will use an automated system to conduct semiannual time and effort certification:

1. Grant-funded employees will certify time and effort, at the end of the fall and spring semesters.
2. The supervisor will verify the employee job and funding source and certify on behalf of the employee.
3. The Grant Manager will verify that all certifications under the grant program are accurate.

JOB DESCRIPTIONS FOR ALL GRANT-FUNDED STAFF

The District develops and distributes job descriptions to all District employees whose positions are wholly or partially funded with grant funds. Job descriptions will include the funding source and the job duties as they relate to the grant-funded position. Grant-funded employees will sign a job description at employment and on an annual basis to acknowledge understanding that the position is grant funded.

The job description and assignment will be supported by documentation (i.e., grade books, master schedule).



POSITION CONTROL OF ALL GRANT-FUNDED STAFF

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



The home campus or department, HCM, and Business and Finance Division shall collaborate to ensure that the position control report accurately reflects the data maintained in their respective areas of responsibility. Discrepancies, if any, in the position control report will be brought to the attention of G&D.

The review of the position control report will include, but not be limited to, the following:

1. Campus or department: Ensure that grant-funded employees are assigned in the position noted on the position control report. The master schedule or assignment of instructional staff must support the position title and funding source.
2. HCM: Ensure that position titles and salaries are correct, as noted on the position control report. In addition, HCM will ensure that each grant-funded staff member has a signed job description on file for the position title noted on the position control report. HCM will ensure that all grant-funded employees are certified or highly qualified, as appropriate.
3. Budget: Ensure that funding sources and salaries are correct, as noted on the position control report. In addition, the Budget Department will ensure that the payroll distribution account code(s) are in accordance with the FASRG.
4. Grant Manager: Ensure that the positions are authorized on the grant application and that the PEIMS Staff Data submitted to TEA is consistent with the position title, role ID, and object code.

The review will occur on at least a quarterly basis throughout the school year to ensure that the position control report of grant-funded staff is accurate and up to date throughout the year. At least one of the reviews will coincide with the submission of the Fall PEIMS Staff Data, to ensure that accurate data is submitted as of the October snapshot date.

The G&D, HCM, and Budget departments shall collaborate to adjust the budget and payroll account code distributions of grant-funded staff if the time and effort documentation consistently reflects that the percentages across the funding sources are not a true reflection of the normal work schedule.

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

- A Employees can be paid by grants through two primary sources: the position control (PPA) mechanism or hourly time records (either manual time cards or automated through the KRONOS timekeeping system). Employees paid through hourly time records are assumed to provide appropriate proof of work performed.
- B Position Control maintains records to support the funding sources for all employees, either local funds (General Fund/199) or other funding sources (i.e., grants and enterprise funds). Positions are funded fully or partially by grant funds. Charges to the grant funds are supported by time and effort reports that reflect the time expended on behalf of the grant project.

- C Positions funded 100% by grants (all time paid is expended on behalf of the grant project) may be documented by a process called certification, in accordance with rules promulgated by the grantor.
- A Positions funded at less than 100% by a grant are documented by time and effort reports generated by the employee. Time and effort reports are used by the Accounting Department to adjust allocations made through the PPA process to properly state the amounts paid by the grant.

I. Certification

- a If an employee's position is paid 100% by a grant, their time and effort may be documented by semiannual certification. The employee or supervisor with firsthand knowledge of the work performed can execute the certification document to support that the work completed and paid for was completed on behalf of the grant program. This step is verified through the online semiannual certification tool.
- b Certain positions (e.g., Title I teachers and Pre-K teachers) perform the same functions throughout the workday, with no differentiation between activity performed for grant recipients and non-grant recipients. Their activity is charged to a single cost objective. All functions performed by the incumbent are completely allowable as grant expenses and could be charged 100% to the grant, but they are charged to the grant at a reduced rate, in effect for accounting/management reasons rather than based on the activity performed during the workday. They may be paid through a combination of fund sources, generally 50% paid by general funds and 50% paid by the funding grant. The District has determined that certification is appropriate for these employees. This step is verified through the online semiannual certification tool.
- c Other positions (e.g., lead content teachers and subject coaches) are eligible to charge payroll expenses to a grant program based on the work performed. For reasons unrelated to the work performed, those activities may be allocated to a particular grant program by an accounting decision. The District has determined that certification is appropriate for these employees. This step is verified through the online semiannual certification tool.
- d The timeline for semiannual certification will be twice per academic year to coincide with the end of the spring semester.



- e The Grant Manager review will consist of the following:
 - A review of the certification forms to ensure that every staff member and supervisor has certified that their schedule is 100% grant-related, and
 - A review of staff assignments (e.g., master schedule and duty schedule) to verify that the schedule is 100% grant-related.

2. Time and Effort Worksheet

- a Positions where multiple grants are charged based on the different activities performed require time and effort reporting documents completed by the employee reflecting the work performed. These employees are required to maintain a time and effort worksheet or to account for their time using the online semiannual certification tool. Employees must prepare time and effort reports at least monthly to coincide with the District pay periods. Such reports must reflect an after-the-fact distribution of 100% of the actual time spent on each activity and must be signed by the employee and the immediate supervisor. The immediate supervisor will submit all signed time and effort reports to the Grant Manager.
- b Charges to payroll must be adjusted to coincide with preparation and submission of the interim expenditure report required for TEA discretionary grants.
- c A report of all individuals charged to a grant is generated to facilitate the tracking of time and effort records.
- d The Accounting Department reviews time and effort records and reports and adjusts cost allocations where PPA allocations do not reasonably reflect the work performed.
- e Letters and emails are sent to staff informing them of time and effort requirements as promulgated by the grantor entities. In addition, information is posted on the Fort Worth ISD website.

- f The time and effort forms and certifications electronically verified by the employee and the supervisor are maintained in the online certification portal. Updates requiring adjustment are provided to the Controller's office on a quarterly basis or when differences are noted.

GENERAL PROCUREMENT STANDARDS

The District will use a purchase order and encumbrance system to manage the expenditure of all federal grant funds unless other methods (such as credit cards) are authorized in the District's operating procedures. All purchases shall be in accordance with Board Policies [CH\(LEGAL\)](#) AND [CH\(LOCAL\)](#) and the District's Purchasing Manual. District purchasing procedures shall comply with all federal, state, and local procurement requirements.

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

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

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

All purchases with federal grant funds shall be in accordance with the federal regulations, specifically CFR 200.317. Purchases will be made from a variety

of qualified vendors with the ability to perform successfully under the terms and conditions of a proposed procurement. The District will strive to avoid acquisition of unnecessary or duplicative items.

Purchase requisitions will be submitted online in the District's financial system (MUNIS) according to a **twofold** requisition review process. The **Grant Manager/Budget Owner** is responsible for approving the requisitions (i.e., ensuring compliance, validity of what is being purchased, and the amount and the account/budget code used). Non-compliant requisitions will be rejected by the Grant Manager/Budget Owner. The **Purchasing Department** serves as a second tier for approving/rejecting requisitions and ensuring procurement compliance.

Compliant requisitions are converted into purchase orders (PO's) in MUNIS by the Purchasing Department, which then sends the PO's to vendors. PO's greater than \$5,000 require an additional approval by the Purchasing Manager; and PO's greater than \$25,000 require an additional approval by the Purchasing Director.

Receipt of goods and services, accounts payable processing, and cash disbursement processing is handled in the same manner as other general fund activities.

The District will implement the following strategies to maximize federal grant funds:

- Consolidate purchases to obtain volume pricing, as appropriate
- Evaluate the cost efficiencies of leases versus purchases of equipment
- Use cooperative purchasing agreements, provided their bids and proposals are EDGAR compliant
- Use federal or state excess/surplus property supplies or equipment in lieu of purchasing new supplies or equipment, as appropriate
- Use value-engineering in construction projects to seek cost reductions
- Abide by TEC 44.031 vendor selection criteria to select the best value vendor
- Develop a system for tracking all formal

procurements

- Avoid "time and materials" contracts if other alternatives exist
- Monitor vendor performance to ensure that the services and/or goods are provided
- Ensure that all contract and vendor disputes are resolved in the most advantageous manner
- Minimize the risk of jurisdictional issues by ensuring that all contracts would be litigated in



a court within the county, city and/or state, as appropriate.

The District shall review the procurement system annually to self-certify that the procurement system is efficient and effective when guidelines for self-certification are available from TEA. The Purchasing Director shall oversee the completion of the self-certification. The results shall be distributed to all grant management staff. If deficiencies are noted, the Grant Manager shall develop a Corrective Action Plan to remedy the deficiencies.

COMPETITIVE PROCUREMENT/VENDOR COMPETITION

The Grants Manager/Purchasing Department will be responsible for selecting and awarding contracts/PO's to vendors that are qualified to provide the goods and/or services to be purchased with federal grant

funds. The vendor selection process will ensure that the District does not restrict competition among qualified vendors.

A vendor notification system is maintained by the Purchasing Department. The District will publish written bid/proposal specifications that are provided to all vendors in the vendor notification system to ensure consistency in the procurement process. At no time will the District allow a specific vendor to develop the bid/proposal specifications, as this may provide a barrier to open competition among the qualified vendors. The Purchasing Department shall produce and finalize all bids/proposal documents before release to the vendors to ensure the documents comply with the federal requirements.

PROCUREMENT METHODS

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

The procurement method will be determined based on the type of goods or services to be purchased with federal grant funds. The Grant Manager/ Purchasing Department will be responsible for selecting the appropriate procurement method for each purchase.

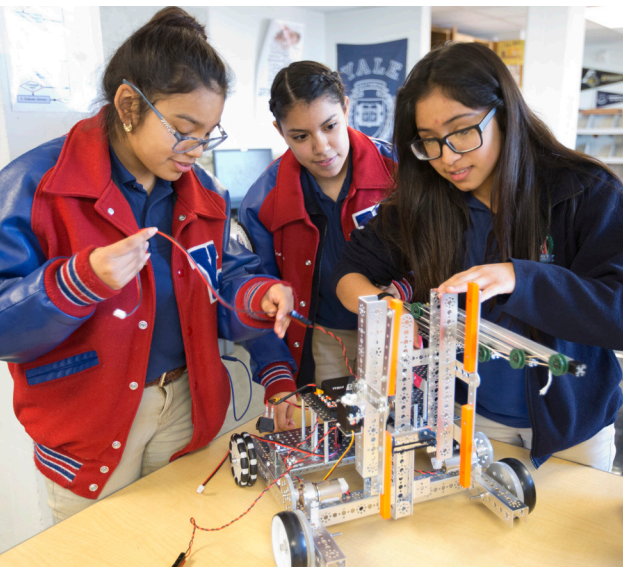
Micro-purchase Procedures

The procurement by micro-purchase method is used for purchases of goods or services that are less than \$10,000 in the aggregate (per fiscal year), as defined in CFR 200.67, as stated below:

Micro-purchase means a purchase of supplies or services using simplified acquisition procedures, the aggregate amount of which does not exceed the micro-purchase threshold. Micro-purchase procedures comprise a subset of a non-federal entity's small purchase procedures. The non-federal entity uses such procedures in order to expedite the completion of its lowest-dollar small purchase transactions and minimize the associated administrative burden and cost. The micro-purchase threshold is set by the federal Acquisition Regulation at 48 CFR Subpart 2.1 (Definitions) ... but this threshold is periodically adjusted for inflation.

To the extent practicable, the non-federal entity must distribute micro-purchases equitably among qualified suppliers. Micro-purchases may be awarded without soliciting competitive quotations if the non-federal entity considers the price to be reasonable; however, one vendor price quote is required for the requisition in MUNIS.

A price quote from an awarded vendor is recommended. An awarded vendor is defined as a vendor that has gone through the competitive procurement process for qualifications, discounts, and/or line item type purchases. Awarded vendors



can be found on the Purchasing Department's website/portal.

Because of the annual aggregate limit and the size of the District, micro-purchases will be used on an exception basis, and the small purchase procedure is recommended.

Small Purchase Procedures

The procurement by small purchase procedures method will be used by the District when the purchase of goods or services does not exceed the \$250,000 simplified acquisition threshold (CFR 200.88). *The simplified acquisition threshold means the dollar amount below which a non-federal entity may purchase property or services using small purchase methods. Non-federal entities adopt small purchase procedures in order to expedite the purchase of items costing less than the simplified acquisition threshold. The simplified acquisition threshold is set by the Federal Acquisition Regulation at 48 CFR Subpart 2.1 (Definitions) and in accordance with 41 U.S. Code 1908. As of the publication of this part, the simplified acquisition threshold is \$250,000, but this threshold is periodically adjusted for inflation.*

However, Texas Education Code 44.031 requires that all purchases valued at \$50,000 or more in the aggregate per fiscal year must be competitively procured.

Additionally, Board Policy [CH\(LOCAL\)](#) requires Board approval for any purchase order or contract that exceeds \$50,000 before a PO is issued so that a transaction may take place.

The Purchasing Department recommends a minimum of three written quotes from awarded vendors for small purchases. Additionally, a quote summary form may be used to:

1. compare quotes and
2. provide justification if the lowest quote is not selected.

The quote summary and price quotes shall be attached to the requisition paper-clip/Tyler Content Manager (TCM) in MUNIS for record keeping. The District will strive to obtain small purchases from

awarded vendors. An awarded vendor is defined as a vendor that has completed the competitive procurement process for qualifications, discounts, and/or line item type purchases. **Awarded vendors** and quote summary forms can be found on the Purchasing Department's SharePoint Site: [Purchasing Portal](#).

Cooperative purchasing programs also provide awarded vendors that can be used to obtain price quotes. Cooperative purchasing programs used by the District include, but are not limited to:

- National Intergovernmental Purchasing Alliance (NIPA)
- Sourcwell - formerly National Joint Powers Alliance (NJPA)
- Texas Interlocal Purchasing System (TIPS)
- OMNIA Partners
- The Texas Local Government Purchasing Cooperative (Buy Board)

If a purchase is less than \$250,000, either the small purchase procedures or the sealed bid/competitive proposal method may be used. The sealed bid/competitive proposal method is required for purchases that exceed \$250,000.

TABLE 4. PURCHASES BY DOLLAR THRESHOLD

Purchase Amount	Procurement Process	# of Quotes Recommended	Notes
> \$50,000	Small Purchase	3 Quotes	3 quotes from awarded vendors. Use the quote summary form in addition to the quotes.
> \$25,000	Request for Proposal	3 Quotes	For Professional and/or Consulting Services per Board Policy CH(LOCAL) .
> \$50,000	Board Approval		Board approval required per Board Policy CH(LOCAL) . Follow the Board Authorization Request (BAR) Process.
\$50,000 – \$250,000	Small Purchase or Sealed Bid/Proposal	3 Quotes or Sealed Bid/Proposal	Board approval needed.
> \$250,000	Sealed Bid/Proposal		Board approval needed.

Sealed Bid Procedures

The procurement by sealed bids method shall be used by the District when the purchase of goods or services exceeds \$250,000 if the acquisition of the goods or services lends itself to a fixed price contract and the selection of the successful bidder can be made principally based on price. The District will comply with the sealed bid requirements as defined by EDGAR, as noted below:

- Bids must be solicited from an adequate number of bidders, but no less than two bidders.
- Bids must be publicly advertised, and bidders will be provided an adequate amount of time to prepare and submit their bid.
 - The District will publicly advertise all bids in accordance with state law, at one time per week in at least two separate weeks.
 - The District will provide no less than ten days for bidders to prepare and submit bids.
- Bids must contain detailed specifications to ensure that bidders have a clear understanding of the goods or services that the District is seeking to purchase.
- The bid will identify the evaluation factors and their weight in awarding the bid.
- Bids must specify the time, date and District location where bids will be opened publicly.
- Bids must be awarded based on a fixed price contract to the lowest responsive and responsible bidder. The District will consider discounts, transportation costs, and life cycle costs only if these factors were included in the bid specifications. The District will not consider payment discounts, because the District does not routinely take advantage of payment discounts.
- Bids will be evaluated, ranked, and recommended for award to the Purchasing Department.
 - Board approval will be required for purchases that exceed \$50,000.
 - If no bidder is recommended, the District will reject all bids and evaluate whether to modify the bid specifications to initiate a new bid.
- The District will notify the successful bidder and process the contract documents and/or purchase orders, as appropriate.

Competitive Proposal Procedures

The procurement by competitive proposal method shall be used by the District when the acquisition of the goods or services exceeds \$250,000 and does not lend itself to a fixed price contract. The District shall comply with the proposal requirements, as defined by EDGAR, as noted below:

- Requests for Proposals (RFPs) must be publicly advertised.
- The RFP will identify the evaluation factors and their weight in awarding the proposal.
- Proposals will be solicited from an adequate number of bidders, but no less than two qualified vendors.
- Proposals will be evaluated, ranked, and recommended for award to the Purchasing Department.
 - o Board approval will be required for purchases that exceed \$50,000.
 - o The District will develop an instrument to evaluate each proposal and rank the proposals based on the evaluation scores.
 - o The District will evaluate each proposal by a committee of no less than three District staff with knowledge of the RFP specifications.
- o The vendor ranked highest as providing the proposal most advantageous to the District will be notified of the potential award.
- The District may negotiate with the vendor.
- If the District and vendor cease to negotiate, the District will notify the vendor in writing before starting to negotiate with the second highest ranked vendor.



TABLE 5. THE COMPETITIVE PROCUREMENT PROCESS

Task	Description	Who is Responsible
Evaluate Purchasing Needs & Confirm Availability of Approved Budgeted Funds.	<p>Define the need(s) of the district and establish the minimum acceptable requirements that the product/service must meet in order to satisfy the need(s).</p> <p>Ensure that funds are available to procure the products/services needed. The Notice of Grant Award (NOGA)/budget can be used to prove the availability of funds.</p>	User department/ campus
Prepare Bid Specifications	<p>Note: vendors cannot prepare bid specifications. If they are provided; do not use them. If they respond, the vendor is not allowed to compete for the award nor be evaluated and the vendor's bid response must be rejected. (2 CFR 200.319)</p> <ul style="list-style-type: none"> We may find that the goods or services are available through a COOP. <p>Prepare detailed written specifications to define the product/service the district is seeking. Specifications must contain adequate technical descriptions to clearly identify the type of material, equipment, or services required. Descriptions must include quantitative data such as size, weight, or volume and qualitative data such as commercial grade, texture, finish, strength, chemical analysis, or composition where required. The specifications must also include;</p> <ul style="list-style-type: none"> Detailed description of the item/service that specifies the minimum acceptable requirements the user department/campus will accept. Industry standards should be used whenever possible. A "brand name or equivalent" description may be used as a means to define the performance or other salient requirements of procurement. The specific features of the named brand which must be met by offers must be clearly stated. Do not simply state a brand names but rather identify the qualitative qualities necessary. Quantity required. Required delivery date and/or period of performance for the bid/contract. Any relevant prints, diagrams, and/or samples of the item requested. Suggested source(s) of supply. Vendor name, address, phone number, email, etc. 	User department/ campus
Procurement meeting	<p>Items to be discussed during the meeting include the following:</p> <ul style="list-style-type: none"> Review the item/service specifications to determine if competitive bids can be obtained and to ensure that Federal, State, and Local laws are followed (including Board policies and internal procedures). Determination of the type of procurement <ul style="list-style-type: none"> ITB – Firm Fixed Price/Low Bid (2 CFR 200.320(c)). CSP/RFP – Most advantageous/Best Value (Price/other factors) (2 CFR 200.320(d)). Independent Cost/Price Estimate (2 CFR 200.323). <ul style="list-style-type: none"> Historical price and costs data. Current or past contracts for the same or similar product/services. Vendor survey/market survey. Use past spend/history. Evaluation/award criteria points/weights. Determine the funding source. 	User department/ campus & Purchasing Department

TABLE 5. THE COMPETITIVE PROCUREMENT PROCESS (CONTINUED)

Task	Description	Who is Responsible
	<p>Evaluation Criteria</p> <ol style="list-style-type: none"> the purchase price; the reputation of the vendor and of the vendor's goods or services; the quality of the vendor's goods or services; the extent to which the goods or services meet the district's needs; the vendor's past relationship with the district; the impact on the ability of the district to comply with laws and rules relating to historically underutilized businesses; (2 CFR 200.321) the total long-term cost to the district to acquire the vendor's goods or services; for a contract for goods and services, other than goods and services related to telecommunications and information services, building construction and maintenance, or instructional materials, whether the vendor or the vendor's ultimate parent company or majority owner: (2 CFR 200.319 (A)(7)) <ol style="list-style-type: none"> has its principal place of business in this state; or employs at least 500 persons in this state; and Number 8 can be listed but must be zero points or percent. any other relevant factors to be considered must be listed in the bid. <p>Other topics:</p> <ul style="list-style-type: none"> Determine length of the contract/optional renewals, etc. Evaluation team composition. Advertising dates. Pre-Bid Conference, vendor demonstrations, etc. Format for vendor responses. Number of vendor copies in addition to the original. 	
Advertise	<p>Ensure bids are published for a minimum of once per week for at least two weeks before the deadline for receiving bids responses. Additionally, bids can be made available through your district website. Many also use Vendor Notification Systems that send out massive emails to notify vendors of business opportunities.</p>	Purchasing Department
Pre-Bid Conferences	<p>This is an optional procedure. This conference allows vendors to meet with District personnel to clarify specification requirements or to conduct site visits. Do not make this a mandatory or penalize vendors for not attending.</p> <ul style="list-style-type: none"> Be sure to document all attendees. Collection of all questions and post the answers in an addendum. The addendum should also include the names of all attendees. 	User department/ campus and Purchasing Department
Open Bids and Verification of Vendor Responsiveness	<p>Bids must be opened at the date, time, and place specified in the ad unless the bid opening was extended. Do not accept late bids.</p> <ul style="list-style-type: none"> Create a Tab Sheet of all vendors responding to the ad. Determine all responsive vendors for the evaluation process. Reject (and document) bids that are not being accepted. 	Purchasing Department

TABLE 5. THE COMPETITIVE PROCUREMENT PROCESS (CONTINUED)

Task	Description	Who is Responsible
Evaluate Bids	<p>Be sure to use the exact evaluation criteria listed in the bid.</p> <ul style="list-style-type: none"> • Create the scorecard/rubric for the evaluation committee • A best practice is to have no less than three evaluators that are familiar with the specifications. • Another best practice is to have all evaluators complete a No Conflict of Interest/ Non-Disclosure Statement. • If there is only one vendor response, a cost analysis must be conducted to prove cost reasonableness. EDGAR (2 CFR 200.323 (b)) • Vendor Demonstrations <ul style="list-style-type: none"> ○ This second phase consists of interviews or vendor demonstrations from the top vendors based on the results of the initial evaluations (some call this the short list). ○ You will have to create new evaluation criteria. The same must be used for all shortlisted vendors. ○ It is best to send the new scoring criteria to the shortlisted vendors in advance. ○ You will probably have to expand the evaluation committee. ○ Set time limits for presentations with a period for unique questions and answers. 	User department/ campus and Purchasing Department
Recommendation for Award	<p>The chair of the evaluation committee normally writes an award recommendation containing the following information and forwards it to the Purchasing Department.</p> <ol style="list-style-type: none"> 1. Description of supply, product, or service. 2. Evaluation results/justification for recommendation: <ul style="list-style-type: none"> ○ Explain how the recommendation was determined (price, quality, delivery, etc. based on the evaluation criteria in the bid. ○ Summarize the price analysis, bid/proposal results, demonstration results, and overall justification for vendor award recommendation. ○ If the solicitation is an Invitation for Bid (ITB) and the low bid is not selected, explain why the lower bid(s) were not acceptable. 3. Name of recommended vendor(s) 4. Annual estimated cost/expense 5. Fund source/Account Code: General Fund, Special Revenue, etc. 6. Signature of the evaluation committee chair/members. <p>If all bids are rejected, the letter must contain:</p> <ol style="list-style-type: none"> 1. Description of supply, product or service. 2. Justification for recommendation to reject all bids listing reasons for rejection. 3. Request to re-bid. 4. Estimated cost/expenditures. 5. Signature of the evaluation committee chair/members. 	User department/ campus

TABLE 5. THE COMPETITIVE PROCUREMENT PROCESS (CONTINUED)

Task	Description	Who is Responsible
Obtain Board Approval	Depending on your Board Policy CH (LOCAL), Board approval may be required before the successful bidder can be notified of the award. You may have to follow or instruct the end-user on district procedures for submitting items to the Board for approval.	User department/ campus and/or the Purchasing Department
Award Notification	Notify the successful bidder via award letter, purchase order, or formal contract. The awarded vendor may require a formal contract. If so, route the contract for approval according to district procedures.	Purchasing Department
Monitor Performance	Monitor the vendor's performance and ensure they comply with all specifications regarding the product to be delivered or service to be performed, including the condition of product upon delivery, and whether the service was performed or product was delivered within the stated delivery time. You may have a formal system to collect vendor performance such as a vendor report card program. This will allow you to collect performance information in an organized manner and maintain a repository of documentation for planned vendor meetings.	User department/ campus and/or the Purchasing Department
BID/Contract Management	Maintain a system so that Bids and Contracts do not expire without your knowledge. Some automated systems have a notification feature that will email you of a pending action i.e. optional/extension year, rebid, etc. 30, 60, or 90 days before the action is required. In addition to bids, you may be responsible for other agreements or contracts. You will need a system to manage these agreements as well. Examples are MOUs, LOAs, Interlocal Agreements, and formal contracts.	Purchasing Department

Noncompetitive Proposal Procedures (Sole Source and Emergency Purchases)

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

- The goods or services are only available from a single source.
 - **Per TEA, a sole source affidavit or letter is not sufficient to justify sole source.**
- A public exigency or emergency will not permit, and a delay will result from the competitive solicitation process.
 - The District will declare a public exigency or emergency prior to making a purchase of goods or services under this method. An emergency affidavit is required to document these purchases. See Board Policy [CH\(LOCAL\)](#).
- The granting agency or pass-through entity authorized the use of a non-competitive proposal method.
 - **The District must obtain written approval/authorization from the granting agency or pass-through entity.**

- After solicitation of multiple sources, competition is determined to be inadequate.

- The District will determine that competition is inadequate if only one qualifying vendor is responsive to the solicitation. See 2 CFR 200.323(b).

Other Procurement Guidelines

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

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

The District will retain all records related to the procurement of goods and services in accordance with federal, state, and local requirements. In addition, all procurement records will be available for inspection and/or audit during the life of the records. The District shall maintain all procurement records for seven years in accordance with the District's local records retention schedule.



CONSULTANT SERVICES CONTRACTS

All contracts for consultant services purchased with federal grant funds shall be subjected to the same review and approval process as all other District procurements, as explained above. The District's [contract guidelines and procedures](#) are applicable to all federally funded contracts and will be adhered to in procuring, evaluating, selecting and awarding contracts. All contracts and service agreements will be reviewed and approved in accordance with the District guidelines in the same manner as non-grant funds.

Board Policy [CH\(LOCAL\)](#) states that when a purchase order for professional and consulting services exceeds \$25,000, these services will be formally, competitively acquired using the Professional Services Procurement Act, Texas Government Code Chapter 2254, except for those sole source items as described in Texas Education Code 44.031. Contracts greater than \$25,000 require the signatures of the Superintendent or designee. See Board Policy [CH\(LOCAL\)](#).

The Grant Manager and Purchasing Department will review and approve all professional services agreements for compliance with federal regulations regarding professional service costs (2 CFR 200.459 and 200.435).

1. The contract and/or funds must be approved in the grant application, if specific approval is required from the granting agency.
2. The contract's nature and scope of service is directly related to the federal grant award activities.
3. Contracting for the service must be a necessity, considering the District's capacity in that area.
4. The past pattern of costs must be considered, particularly in the years prior to federal awards.
5. The impact of federal awards on the District entity's business must be considered (what new problems have arisen).
6. Whether the proportion of federal work to the District's total business is such as to influence the District in favor of incurring the cost,

particularly where the services rendered are not of a continuing nature and have little relationship to work under federal awards.

7. The contract shall not contain any proposal costs (not allowable under federal regulations).
8. Consideration must be given as to whether the proposed contracted services can be performed more economically by direct employment rather than contracting.
9. Capability of the proposed vendor to perform the required services must be considered.
10. The qualifications of the contracting firm or individual and the customary fees charged by the proposed vendor must be reviewed and approved. A resume, vita, or statement of qualifications will be required for all contracts with independent contractors.
11. The contract and/or consultant agreement must meet the allowable cost principles.
12. The contractual agreement must be adequate for the service (e.g., description of the service, estimate of time required, rate of compensation, and termination provisions).
13. To be allowable, retainer fees must be supported by evidence of bona fide services available or rendered.
14. The contract and/or consultant agreement fee for services shall not exceed any federal grant or local limits.

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

The District shall not execute a Letter of Intent with a third party prior to the issuance of a Notice of Grant Award (NOGA), as deemed appropriate.

All District contracts for services to be funded through a federal grant award will comply with the following contract provisions:

- The contract is only effective upon receipt by the District of the NOGA from the awarding agency.
- The contract period is aligned to the grant period of availability as stated on the NOGA from the awarding agency.
- All services will be completed during the effective dates of the contract.
- All services will be invoiced monthly after services are received (rather than paid lump sum at the beginning of the period of availability before services are rendered) and paid upon verification of receipt of services.
- The regulations for procurement in 2 CFR 200.318-323 (including the contract provisions of 200.326 Appendix II) are followed in issuing the contract.
- The contract requisition identifies the funding sources that will be charged for the services provided, including the specific amount and/or percentage of the total contract amount to be charged to each funding source.
- The contract identifies and lists only reasonable, necessary, and allocable services to be provided during the period of availability of the funding sources listed in the contract.
- The administrative costs charged to the grant in the contract must comply with any limitations for administrative costs for funding sources (if applicable).
- The contract specifies that the invoice provided by the contractor will include the list of services provided, dates of services, and locations where services were provided during the billing period.
- The contract will not have multi-year extensions without a “non-appropriation of funds” cancellation clause.
- The contract extensions, if included, will restrict the contract renewals and/or extensions to either a “sole discretion of the District” or

“mutual agreement” and not an “automatic renewal.”

- All products created as a result of the District will be vested in the District, and the District will retain all intellectual property rights.

APPROVAL OF GRANT PURCHASES AND EXPENDITURES

The District will adhere to the normal approval path for requisitions/purchase orders with non-grant funds. In addition, all purchase orders with grant funds will be reviewed and approved by the appropriate Grant Manager.

The Grant Manager review will consist of the following:

1. The expenditure is reasonable and necessary as defined in federal grant guidelines. **Note: A test of whether an expense is necessary includes verification that the expenditure is to perform a strategy or activity in the District Improvement Plan or a Campus Improvement Plan.**
2. The expenditure is not required by state law or local policy.
3. The expenditure has been approved in the grant application, if specific approval is required from the granting agency.
4. The expenditure meets the allowable cost principles.
5. The expenditure is allowable and approved in the grant application and is consistent with the grant purpose.
6. The expenditure is supplemental and not supplanting a local expenditure. Note: Refer to compliance issues related to “supplement not supplant” for additional guidance.
7. The expenditure has been competitively procured as required by law, as appropriate.
1. The expenditure has been approved by the governing body, as appropriate. **Note: Board Policy CH(LOCAL) established the threshold for Board approval for contracts at \$50,000.**

The District has a process in place for unusual circumstances grant expenditures that fall under the following:

1. Invoice amount exceeds the purchase order
2. Payment of an invoice will be paid by an account code(s) other than the original account code(s) that were used to encumber the purchase order
3. Travel expenditures, if not encumbered through the purchase order system
4. Reclassification of a prior expenditure from one account code to another

CREDIT CARD PURCHASES WITH GRANT FUNDS

The District may use District-issued credit cards to make purchases with federal grant funds. The same approvals are required for credit card purchases as are required for non-federal purchases.

An original, detailed receipt will be required for all credit card purchases with federal funds. If the purchaser does not submit an original, detailed receipt for audit purposes, the expenditure and/or reimbursement may not be charged to a federal fund. At no time will District credit cards be used to withdraw cash.

The Grant Manager will review and approve all requisitions involving credit card transactions and expenditures.

The Grant Manager administrative review will consist of the following:

1. The purchaser has documented a valid reason for the purchase which is consistent with the grant guidelines
2. The credit card purchase meets the allowable cost principles
3. The purchaser is required to return an original, detailed receipt that includes an itemized list of what was purchased for review by the Grant Manager and/or the Purchasing Department.

Fraudulent credit card purchases made with federal grant funds will be grounds for disciplinary action, up to and including termination of employment. The appropriate legal authorities will be notified for

criminal prosecution, as appropriate. Accidental use of a credit card to make an unauthorized purchase with federal grant funds may be subject to similar disciplinary action but will require immediate restitution to the District.

TRAVEL EXPENDITURES WITH GRANT FUNDS (STUDENTS AND STAFF)

The District may use federal grant funds for travel costs. All travel-related expenditures from grant



funds shall comply with the allowable federal cost principles, Board Policy, and FWISD travel guidelines. Travel-related expenditures with grant funds will fall within the grant period, unless a specific exception is allowable by the granting agency.

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

- **A Travel Authorization/Settlement Form** must be completed for all travel.
- **Registration Fees** will be allowable if the event is related to grant activities. **Registration fees may be paid from the current grant period for an event during the next grant period only if there is an absolute deadline to register for the event.** Early registration deadlines will not apply. Recreational or social events subject to an

additional fee above and beyond the registration fee will not be allowed with grant funds.

- **Meal Expenses** for overnight travel (in accordance with local travel guidelines) will be allowed for District employees and students. Non-overnight travel meal expenses will not be allowed. The District will advance or reimburse meal expenses, subject to the GSA limits, on an accountable per diem basis only. The traveler will submit receipts for actual meal costs for work-



related meals and shall return the unused meal funds to the District. The meal per diem will be adjusted in accordance with IRS regulations regarding the day of departure/return and meals provided without cost as part of the registration fee.

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

Transportation expenses will be reasonable and limited to the guidance in the cost principles.

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

The Grant Manager will review and approve all travel-related trips and limits to be paid with federal grant funds to ensure that:

1. The traveler has documented a valid reason for the travel which is consistent with the grant guidelines and purpose.
2. The travel is not for the Superintendent or another individual (non-employee such as family or School Board member).
3. The travel is for students during an educational field trip or other approved activity in accordance with grant guidelines and purpose.
4. The travel is not for a contractor or consultant for their professional development.
5. The travel was approved by the granting agency, as appropriate (e.g., travel out of the country).
6. The traveler returns an original, detailed receipt including an itemized list of what was purchased for review by the Purchasing Department.

PROPERTY STANDARDS

The District will safeguard all property (assets and inventory) purchased with federal grant funds under the same guidelines as property purchased with local funds. Additional insurance for property purchased with federal grant funds will be acquired if specifically required by a federal grant award. The Director of Risk Management will oversee the acquisition of insurance for all federally funded property.

The District has not and shall not use federal grant funds to purchase real property.

Equipment and Supplies

The District may use federal grant funds to purchase equipment and supplies.

Federally Funded Equipment will be used only for the authorized purposes and will be disposed of at

the end of the useful life or end of the grant period, in accordance with the grant award guidelines.

Federally Funded Supplies will be used only for authorized purposes. Any residual (unused) supplies in excess of \$5,000 in total aggregate value at the end of the grant program or project may be used for any other federal grant program. Otherwise, the supplies will be retained by the District or sold; however, the District must reimburse the granting agency for the District use or sale of the supplies. The District will follow established purchasing deadlines for the purchase of federally funded supplies — including Title I timelines — to ensure that residual supplies are not available at the end of the grant period or project. Purchasing deadlines are published each year by the Business and Finance Division.

Capitalization Policy and Definitions

The District will use the same capitalization policy for non-grant and grant-funded asset purchases. The District's capitalization threshold for equipment assets is \$5,000 per unit cost. The District has adopted the EDGAR (CFR 200.12) definitions of property, as noted below:

- **Capital Assets:** Tangible or intangible assets used in operations having a useful life of more than one year which are capitalized in accordance with GAAP (CFR 200.12)
- **Equipment:** Tangible personal property (including information technology systems) having a useful life of more than one year and a per-unit acquisition cost which equals or exceeds \$5,000 (CFR 200.33)
- **Computing Devices:** Machines used to acquire, store, analyze, process, and publish data and other information electronically, including accessories (or peripherals) for printing, transmitting and receiving, or storing electronic information (CFR 200.20)
- **General Purpose Equipment:** Equipment which is not limited to research, medical, scientific or other technical activities. Examples include office equipment and furnishings, modular offices, telephone networks, information technology equipment and systems,

air conditioning equipment, reproduction and printing equipment, and motor vehicles.

- **Information Technology Systems:** Computing devices, ancillary equipment, software, firmware, and similar procedures, services (including support services), and related resources (CFR 200.58)
- **Special Purpose Equipment:** Equipment which is used only for research, medical, scientific, or other technical activities. Examples of special purpose equipment include microscopes, X-Ray machines, surgical instruments, and spectrometers.
- **Supplies:** All tangible personal property other than those described in CFR 200.33 Equipment. A computing device is a supply if the acquisition cost is less than \$5,000, regardless of the length of its useful life (CFR 200.94).

ACQUISITION COST

The District has adopted the EDGAR definition of acquisition cost, as noted below:

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

The District will use the invoice cost and all related costs to record the cost of the equipment on the fixed asset database.

A Capital Asset for Equipment and Vehicles is defined as being an item of a tangible nature that is not consumed in use, having a useful life of one year or more and a cost value of \$5,000 or more.

This no longer includes group assets that have individual cost values less than \$5,000 but when purchased collectively have a total one-time purchase cost greater than \$5,000. Capital assets will be depreciated over their established useful lives.

The District has defined **Technology-related Walkable or Personal Use Items** with a unit cost less than \$1,000 as the following:

- Tablet
- Kindle/Nook
- Laptop

These items will be tracked by the Technology Department.

Identifying and Tracking Federally Funded Assets

The title to federally funded equipment and supply purchases will be retained by the District, unless otherwise notified by the granting agency. As District property, the Capital Asset Accountant will affix a tag, inventory, and dispose of all assets (non-grant and grant-funded) according to the District's fixed asset procedures.

To facilitate tracking, a purchase order must be approved by the Purchasing Department prior to the capital asset items being ordered. All items to be tracked by the Accounting Department will be delivered to the District. If the item is of such a unique nature or quantity that it must be delivered directly to the school, then the principal is responsible for notifying the Capital Asset Accountant when the goods are received and can be tagged.

District procedures will include the recording of all assets on a database with the following information:

1. District-issued tag or identification number
2. Date of acquisition
3. Description of asset
4. Serial number or other identifying number
5. Funding source (i.e., fund code)
6. Federal use of asset (percentage)
7. Cost of asset (acquisition cost)
8. Use and condition of the asset (new, used, etc.)

9. Life of asset
10. Location of asset (building and room number)
11. Depreciation of asset
12. Owner of asset title, typically the District

Maintaining Asset Inventory and Records

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

The District fixed asset procedures will include an annual inventory (or more frequently if required by a granting agency) of all assets and reconciliation of the inventory reports. **Note: CFR 200.313 requires an inventory at least once every two years.** The District's annual inventory of assets will be conducted by the Capital Asset Accountant each fiscal year. Lost, damaged, or stolen assets will be recorded on the fixed assets database with the date of the loss. The disposition records such as the loss report (or police report for thefts) will be maintained with the asset records.

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

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

The District will use MUNIS to record, manage, and maintain the information required through the Fixed Assets Module.

The Capital Asset Accountant will be responsible for maintaining the fixed asset database of all District assets, including all federally funded assets. The Accounting Department keeps capital asset

and depreciation records; inventories of other items requiring control and accountability are kept by each school on a standard database program. These items usually have serial numbers and model numbers for unique identification. Group items such as chairs and desks may or may not be capital assets, but on any inventory they are carried as group assets (e.g., 200 cafeteria chairs), not as individual chairs. Property ownership tags may be attached to non-capital asset items by staff at the school.

Library books and other media and musical instruments

are not considered capital assets unless they meet the capital asset criteria listed above. The detailed inventory of musical instruments is maintained by the Music Department, not the Accounting Department. Purchases of these items costing less than \$5,000 are charged to expense accounts, not capital asset accounts.

Capital items purchased with federal funds must be used only for the educational group identified by the grantor. Control over capital items purchased with federal funds is the responsibility of the department director of the source grantee.

INTERNAL CONTROLS

In accordance with 2 CFR 200.61, internal controls means a process implemented by the District to provide reasonable assurance regarding the achievement of objectives in the following categories:

- a Effectiveness and efficiency of operations
- b Reliability of reporting for internal and external use, and
- c Compliance with applicable laws and regulations

Internal control over compliance requirements for federal awards means a process implemented by the District designed to provide reasonable assurance regarding the achievement of the following objectives for federal awards:

- Transactions are properly recorded and accounted for in order to:
 - o Permit the preparation of reliable financial statements and federal reports.
 - o Maintain accountability over assets.
- Demonstrate compliance with statutes, regulations, and the terms and conditions of the award.
- Transactions are executed in compliance with:
 - o Laws, regulations, and the terms and conditions of the award that could have a direct and material effect on a federal program.
 - o Any other statutes and regulations that are identified in the Audit Compliance Supplement.
- Funds, property, and other assets are safeguarded against loss and from unauthorized use or disposition.

To accomplish these objectives, the District will develop and maintain policies, procedures, and effective practices to ensure federal funds are properly administered and spent and federal property is safeguarded against loss and from unauthorized use or disposition. The District also ensures that all employees who deal with federal funds are aware of the policies and procedures and are properly trained in the use of them.

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

PROGRAM INCOME

The District will not generate any program income as part of a federal grant award.

GRANT ACCOUNTING PROCESS

Upon completion of work by the Budget Department and the assignment of a project number to the grant, the NOGA information is passed to the Grant Accounting Department where a file folder is set up. A log of all grants to be accounted for is updated and grants are assigned to an accountant for reporting of expenditure.

Each file is labeled indicating the following:

- Fund #
- Owner #
- Project #
- NOGA #
- Grant Name

Monthly financial reports: An excel spreadsheet provides for an accounting of all receipts and disbursements that occur in the grant. The grant accountant will generate a monthly accounting report summarizing the activity that occurred in the grant that month. This report accumulates the expenditures year-to-date, compares this to the prior month's reports, and generates the amount of funds due to the District for the current month end. The report also monitors compliance with the approved budget and cash payments received. A journal entry summary is generated for entry.

MUNIS reports used in this preparation process are as follows:

- Flexible Period Earnings Report
- YTD Budgetary Report

PREPARING EXPENDITURE REPORTS & DRAWDOWN OF FUNDS

DRAWDOWN OF GRANT FUNDS

The District will drawdown grant funds that have been spent in accordance with the grant guidelines monthly, or as allowed or required by the grant guidelines. The drawdown will be for all expenditures to date, less grant funds received to date, as verified by a financial general ledger. Note: The expenditures will be net of all refunds, rebates, discounts, credits, and other adjustments, if any.

At no time shall the District drawdown any **“advanced” cash payments**, unless specifically allowed by the granting agency.

The drawdown of grant funds from the granting agency will be initiated by the Accounting Department. A detailed summary general ledger of each grant fund should be generated to determine if the District is entitled to drawdown funds (i.e., if the granting agency owes the District any funds). If the District has funds available for drawdown, a summary of the status submission should be generated and forwarded to the Grant Manager for review.



Grant Draw

A **draw** is generated through the federal or state granting entity website. The draw and supporting information are provided to the office of the Controller for certification for payment. All necessary journal entries required, including those involving indirect costs, are generated by the grant accountant to record the receivable due. Some grants require that a billing statement is generated and provided to the grantor. The billing information and supporting information is provided to the office of the Controller for certification for payment.

Cash receipts: Deposits are received by the District's treasurer through EFT/ACH direct deposit. Once received the deposit is posted to account 124X by grant project number. The District's cashiers will post any checks received to account 124X by the grant project number. This process ensures proper separation of duties from accounting and reporting and cash collection to provide for proper internal controls.

If a grant has a **matching requirement**, the District shall drawdown only the allowable amount after verifying compliance with the level of matching expenditures.

The Accounting Department will be responsible for ensuring that the requested drawdown amount does not exceed a grant-specific drawdown amount, or percentage.

Each grant will have an annual grant close out. Any final general journals required will be generated, including any adjustments to expenditures, revenues, or balance sheet accounts. A final expenditure report will be generated and filed.

Journal Entries

Journal entries (JE's) are generated by each grant accountant on a monthly basis to track all monies due to the District as a result of the reports generated as well as any other adjustments necessary to properly reflect grant expenditures, including any reclassification of expenditures. JE's are entered into the District's accounting system by each grant accountant. JE's are approved for posting by the District's Controller.

The final drawdown of grant funds from the granting agency will be made within the allowable time frame. The grant liquidation guidelines will be adhered to in making final payment for all goods and services received and placed into service before the end of the grant period. The drawdown process will be the same as a monthly or periodic drawdown, except that all refunds, rebates, credits, discounts or other adjustments to the general ledger must be recorded in the general ledger prior to submitting the final drawdown request. The final drawdown will be reviewed and approved in the same manner as a periodic drawdown.

Federal regulations (CFR 200.415) require that the District certify the accuracy of the annual and fiscal reports or vouchers requesting payments be signed by the authorized individual(s). The Controller shall certify every drawdown of funds, including the final expenditure report (drawdown of funds) as noted below:

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

If a final drawdown deadline is missed, the Controller will contact the granting agency to determine whether a process exists to request a filing deadline extension.

The receivable from the granting agency will be recorded in the general ledger. The District will adhere to the same process for preparation and posting of the general ledger entry as a periodic drawdown.

Receipt of Grant Funds

- Once the controller has approved the reimbursement request online with TEA, it takes two to three days for processing by TEA and disbursement to the District's depository.
- The deposits are received by EFT/ACH direct deposit. The cashier enters the receipt into the system. The Treasurer posts the deposits received after verification. The backup documents and a copy of the bank deposit are scanned and attached to the cash receipt in the system.
- The receipt is entered on the accountant's next request. The lead accountant reviews the spreadsheet and verifies that the funds received match the amount previously approved on the TEA expenditure report.

All District staff, especially those assigned with federal grant duties, shall adhere to the cash management procedures. Specifically, all cash received by the District will be deposited, recorded, and reconciled by multiple individuals to ensure segregation of duties.

The District will record all grant fund receivables upon receipt from the granting agency. The receipt of grant funds will be posted to the general ledger to the appropriate receivable account code. If the grant funds received do not match the recorded receivable, the Accounting Department will contact the granting agency to determine the discrepancy. If the granting agency has reduced or increased the grant funds paid to the District, a general ledger adjustment will be posted to the appropriate revenue and receivable accounts. The Accounting Department will prepare the adjusting journal ledger entry and post the entry to the general ledger.

The District does not maintain grant funds in a separate bank account. The District has elected to drawdown federal grant funds under the cash reimbursement program guidelines (i.e., after the delivery of the payment to the payee). No interest will be earned, recorded, or returned to the granting agency as a result of the cash reimbursement program.

Tracking and Recording Receivables

On at least a monthly basis, the Accounting Department will review all pending receivables. Aged receivables, defined as greater than 60 days from the date of recording, will be investigated and resolved by contacting the granting agency.

FWISD Accounting has a routine close for each month that applies to all funds, including special revenues (grants). Following is an outline of the steps that are taken:

1. The default date for all journals is changed to the new month on the first day of the month.
2. All cash-related entries must be entered by the first Monday after the first Friday.
3. All other entries must be entered by the Friday after #2 (above).
4. The software receives a monthly "cleaning" on the weekend following #3 (above).
5. After these four steps have been taken, the month is closed and statements and other reports may be created and disbursed.
6. The monthly reports to the Board are produced and presented to upper management for approval approximately 45 days after this process.

At the end of the fiscal year, all known and measurable receivables will be recorded to the general ledger to the appropriate grant code. The Accounting Department will prepare the journal ledger entry and post the entry to the finance general ledger.

END OF FISCAL YEAR PROCESS

FWISD Accounting close for year end begins approximately one month after June 30 each year. The broad steps below are followed in order to complete a good clean close:

1. A thorough analysis of the balance sheet occurs from May through July.
2. All entries that apply to the closing year are posted to June.
3. The last week of July the software is officially closed and the closing (13th) period is opened for audit entries.

4. An external audit is done each year July through September. The single audit is also done at this time.
5. The Comprehensive Annual Financial Report is completed, approved by the Board's Audit Committee, and presented to the Board in November.

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

All end-of-fiscal-year adjustments should be posted to the general ledger prior to closing out the fiscal year. Prior to the start of the audit field work, the following adjustments will be posted to the general ledger:

- Reconcile all cash and investment accounts – all cash and investment accounts will match the corresponding bank or investment general ledger balances as of June 30, as reflected on the respective monthly statement.
- Reconcile all revenue accounts with amounts received and/or earned as of June 30 – all measurable revenue should be posted to the general ledger. For example, all state aid earned as of the most recent Summary of Finance report from TEA will be posted to the appropriate state revenue accounts.
- Reconcile all grant revenue and expenditures – the revenue and expenditures in every grant program (state and federal) should equal. The excess revenue (if any) should be reclassified to a payable to the granting agency, unless the excess revenue is an advance payment (deferred revenue). If expenditures exceed revenue, the amount due from the granting agency should be posted to the revenue account and accounts receivable accounts.
- Reconcile the final amended budget – verify that all budget amendments (at the functional level) have been posted to the general ledger. The sum of the original budget plus all budget amendments during the fiscal year will equal the final amended budget.

- Reconcile and post all accounts receivables – all funds due from other sources as of June 30 will be posted to the general ledger. The receivables will be measurable and expected to be received within 60 days after the end of the fiscal year in accordance with the District's accounting standards.
- Reconcile and post all accounts payables – all payables due to others (vendors especially) as of June 30 will be posted to the general ledger.



The amounts due for all goods and/or services received as of June 30 are classified as accounts payable and paid during the next fiscal year. The District has established a cut-off for prior year accounts payables, unless the accounts payable expense exceeds \$10,000 and is known prior to the end of the audit field work.

- Reconcile all accrued wages and benefits as of June 30 – All accrued wages and benefits will be posted to the general ledger.
- Reconcile all prepaid expenses as of June 30 – All prepaid expenses will be posted to the general ledger to object code 1410. A prepaid expense is typically one that represents a disbursement of funds (payment) for goods or services that will be received or used in the next fiscal year. For example, a maintenance agreement that has a term of January 1 through

December 31 would have an expense for six months in the current fiscal and a prepaid expense of six months at the end of the fiscal year.

- Reconcile the fixed assets ledger with all fixed asset additions, deletions, or changes – All assets (as defined in the fixed asset procedures) acquired during the fiscal year will be added to the fixed asset ledger (database or excel spreadsheet). All assets disposed of (sold or lost) will be removed from the fixed asset ledger. Changes (if any) to the location, value, or category of assets will be posted to the fixed asset ledger in fund code 901.
- Reconcile the fund balance as of June 30 – All changes, reductions, additions, and/or designations (restricted, committed, assigned, etc.) of fund balance accounts will be posted to the general ledger. All budgetary fund balance accounts (object code 3700) will be posted to the appropriate fund balance account (typically object code 3600).

REPORTING REQUIREMENTS

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

1. Programmatic reports such as activity, progress, and evaluations: G&D, R&E, and Grant Manager
2. Expenditure reports such as interim, drawdown, and final expenditure reports: Accounting Department
3. Compliance reports such as comparability, maintenance of effort, and indirect cost: Budget and Accounting departments with the support of the Grant Manager
4. Highly qualified staff reports: Certifications Department in collaboration with the Grant Manager

The Grant Manager will monitor the overall master list to ensure that all reporting requirements have been completed by the appropriate campus or department.

GRANT MONITORING AND ACCOUNTABILITY

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

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

Grants Compliance and Monitoring will provide programmatic and evaluation compliance, as requested, and the Accounting Department will be responsible for the financial compliance on all federal grants. The Grant Manager will monitor the timing of grant activities throughout the grant period, especially as they relate to the desired outcomes. The Accounting Department will monitor the timing of grant expenditures, especially as they relate to the period of availability of grant funds. If either the grant activities or grant expenditures reflect that the District will not accomplish the grant activities during the grant period, the Grant Manager and the Accounting Department will work collaboratively to develop an action plan to ensure that the federal grant goals are met. The oversight of grant activities and expenditures will include, but not be limited to, the following:

- Cost overruns or high unit costs
- Construction projects – certification of project completeness (as evidenced by the AIA)
- Significant developments that may result in an inability to complete the grant activities.

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

Audit findings or deficiencies will be addressed in a timely manner upon receipt of the notification. The Accounting, Budget, HCM, and G&D staff will work collaboratively to develop and implement a Corrective Action Plan to resolve the findings or deficiencies. The Senior Officer of G&D or designee will approve the Corrective Action Plan and monitor the timely implementation of corrective strategies.

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

REMEDIES FOR NONCOMPLIANCE

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

GRANT CLOSEOUT PROCEDURES

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

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

GRANT COMPLIANCE AREAS

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

SUPPLEMENT NOT SUPPLANT

Supplement not supplant (SNS) is a provision common to many federal statutes authorizing education grant programs. There is no single SNS definition. The wording of the provision varies depending on the statute that contains it. Although the wording may change from statute to statute, SNS provisions basically require that grantees use state or local funds for all services required by state law, State Board of Education (SBOE) rule, or local policy and prohibit those funds from being diverted for other purposes when federal funds are available. Federal funds must be used to supplement—add to, enhance, expand, increase, extend—the programs and services offered with state and local funds. Federal funds shall not be used to supplant—take the place of, replace—the state and local funds used to offer those programs and services.

The District process to ensure that all grant-funded activities are supplemental will be a collaborative effort among G&D, Accounting, and Purchasing. These departments will receive training and be aware of the SNS provisions.

Because the SNS provision varies by federal grant, the Grant Manager will review and approve all purchase orders (and non-purchase order payments) to ensure that they comply with the SNS guidelines for the respective grant.

The Grant Manager review will include determination of whether the planned purchase or expenditure meets one of the following guidelines:

1. Grant funds will be used to enhance, expand, or extend required activities. Examples may include tutoring before or after school, additional research-based instructional programs, or other supplemental expenditures not required by state law or local policy.
2. Grant funds will be used for specific grant activities included in the grant application that are above and beyond the activities funded with local funds.
3. Grant funds will be used for supplemental activities, as noted in the District Improvement Plan or Campus Improvement Plan.

The District shall comply with program-specific SNS provisions in addition to federal requirements.

COMPARABILITY

Comparability of services is a fiscal accountability requirement that applies to local educational agencies (LEAs) that receive funds under Title I, Part A, of the Elementary and Secondary Education Act of 1965 (ESEA), as reauthorized by the 2015 Every Student Succeeds Act (ESSA). The intent of the comparability of services requirement is to ensure that an LEA does not discriminate (either intentionally or unintentionally) against its Title I schools when distributing resources funded from state and local sources simply because these schools receive federal funds.

In collaboration with the Budget Department, G&D shall conduct the comparability test on an annual basis and complete the Title I, Part A, Comparability Assurance Document (CAD). Note: If the District determines that it is exempt from the comparability requirements, G&D will note the exemption on the CAD and submit it to TEA. If the District is not exempt, G&D will complete and submit the Comparability Computation Form (CCF) to TEA by the mid-November annual deadline. The District will follow the *Title I, Part A, Comparability of Services Guidance Handbook* (TEA version 2.0, rev. 10/2017).

In completing the CAD and CCF, the G&D in

collaboration with the Budget Department will follow the process outlined below:

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

If TEA determines that the District is non-compliant, the Budget and G&D departments shall work collaboratively to address the noncompliance. In addition, the District will adjust the budgets as appropriate until the District is in compliance with the comparability requirement.

INDIRECT COST

The FWISD Controller maintains a current, approved federal indirect cost rate to charge indirect costs to state and federal grants. The indirect cost rate is calculated using costs specified in the grantee's indirect cost plan. Those specified costs may not be charged as direct costs to the grant under any circumstances.

Either the District's indirect cost rate or the maximum allowable rate — whichever is less — will be used to post indirect costs for federal funds to the general fund. The Accounting Department will prepare a general ledger entry for the indirect costs and will post the entry to the finance general ledger.

MAINTENANCE OF EFFORT

The District will comply with the ESSA and Individuals with Disabilities Education Act (IDEA), and ESSER maintenance of effort requirements and the ESSER maintenance of equity requirement.

ESSA MOE

As a condition for receiving its full allocation in any fiscal year, for covered programs under the Elementary and Secondary Education Act of 1965 (ESEA), as reauthorized and amended by the Every Student Succeeds Act of 2015 (ESSA), a local educational agency (LEA) must maintain its own state and local fiscal effort in accordance with Section 8521, ESEA. Under this requirement known as maintenance of effort (MOE), the District must maintain a minimum of 90% of its expenditures for public education from state and local funds from one year to the next to receive funds under a covered program. If the percentage of state and local funds expended in the year under determination is less than 90% of what was expended in the prior fiscal year, the LEA's ESSA allocations for the upcoming fiscal year will be reduced in the exact proportion by which the LEA did not meet the MOE requirement. As used in Section 8101 (11), ESEA, the term "covered program" means each of the following: Title I, Part A; Title I, Part D; Title II, Part A; and Title III, Part A; Title IV, Part B; and Title V, Part B, Subpart 2 [ESSA LEA Maintenance of Effort (MOE) Guidance Handbook, TEA version 1.1, 01/2018].

The Accounting Department with the collaboration of the Grant Manager will compute the MOE using the ESSA LEA MOE Calculation Methodology during the budget adopted process and at the end of the fiscal year. Noncompliance with ESSA MOE will result in a reduction of ESSA funds in the exact proportion by which the District fails to meet the MOE requirement; therefore, the Business and Finance Division will plan for the reduction of grant funds at the local level. If the ESSA MOE falls below the required level, the Accounting and G&D departments will collaborate to develop a plan to bring the District into compliance with the MOE requirements.

IDEA-B MOE

An LEA that accepts IDEA-B funds is required under IDEA-B to expend, for services to students with disabilities, at least an amount equal to 100% of the state and/or local funds it expended on students with disabilities during the previous year. Federal law provides four methods of demonstrating compliance (or "maintaining effort"), as described in the Methods of Determining Compliance section [see page 2, IDEA-B LEA Maintenance of Effort (MOE) Guidance Handbook for FY 2014 and Beyond, TEA version 2.0 10/2013].



The Business and Finance Division with the collaboration of the Grant Manager will compute the MOE using the TEA IDEA-B LEA MOE Calculation Tool [see IDEA-B LEA Maintenance of Effort (MOE) Guidance Handbook for FY 2014 and Beyond, TEA version 2.0 10/2013] during the budget adopted process and at the end of the fiscal year. Noncompliance with IDEA-B MOE will result in a reduction of IDEA-B funds in the exact proportion by which the District fails to meet the MOE requirement; therefore, the Business and Finance Division will plan for the reduction of grant funds at the local level. If the IDEA-B MOE falls below the required level, the Accounting and G&D departments will collaborate to develop a plan to bring the District into compliance with the MOE requirements.

Note: The Budget and Accounting departments will code all special education expenditures that qualify as exceptions to a specific sub-object for tracking purposes. For example, if the District makes a long-term purchase of equipment for a special education student, the District should track that expense separately to apply that cost as an exception during the MOE calculation.

As part of the IDEA-B grant application process, the Grant Manager will need to know the prior year Special Education expenditures and the next fiscal year budgeted Special Education Expenditures. The Business and Finance Division will provide these amounts to the Grant Manager no later than June 1 to ensure that the most accurate amounts are reflected in the grant application. Changes to these amounts, as they are known by the Business and Finance Division, will be submitted to the Grant Manager, as appropriate.

PRIVATE NONPROFIT SCHOOL PARTICIPATION

If the authorizing federal program statute provides for private nonprofit school participation, the District must comply with certain requirements. Before completing and submitting the application, the District must contact the private nonprofit schools located within the District's boundaries, notifying them of the opportunity to participate

in the program. The Private Nonprofit School Participation schedule in the applicable federal grant application must be completed and submitted with the application.

Generally, in accordance with the specific program statute, private nonprofit schools must be consulted in the planning and development of the project. Both children and teachers from private nonprofit schools must be assured equitable participation in all services, materials, equipment, and teacher training.

Prior to completing any federal grant application, the District ensures that private nonprofit schools have been consulted in accordance with the provisions of the statute and in accordance with the guidelines specified in TEA's General and Fiscal Guidelines and Program Guidelines. The Senior Officer of Grants and Development is responsible for ensuring that all requirements pertaining to the participation of private nonprofit schools are carried out.

EQUITABLE ACCESS AND PARTICIPATION

Provisions for equitable access and participation apply to all federally funded grants administered by the U.S. Department of Education. As such, Equitable Access and Participation is a required schedule in the application for any federally funded grant. The application will not be approved in the absence of this schedule.



In accordance with the General Education Provisions Act (GEPA), Section 427, applicants must develop and describe the procedures they will use to ensure equitable access to and equitable participation in the grant program. The barriers to such participation should be identified for all participants and potential participants during the needs assessment phase of the program planning and development.

All applicants, including the District, must address the special needs of students, teachers, and other program beneficiaries to overcome barriers to equitable participation, including those based on gender; race, color; national origin, disability, and age.

The District complies with the requirements for completing the Equitable Access and Participation schedule in each federally funded grant application. The Grant Manager, G&D, and other members of the development team will ensure the review and generation of appropriate strategies to overcome barriers identified.

CIVIL RIGHTS AND PROHIBITION OF DISCRIMINATION

Several federal civil rights laws prohibit discrimination in programs or activities that receive federal funds from the USDE. These laws prohibit discrimination on the basis of race, color; national origin, sex, disability, and age. The civil rights laws extend to all state educational agencies, elementary and secondary school systems, colleges and universities, vocational schools, proprietary schools, state vocational rehabilitation agencies, libraries, and museums that receive USDE funds.

TABLE 6. THE FOUR PRIMARY CIVIL RIGHTS LAWS

Subject	Statute	Regulation
Discrimination on the basis of race, color, or national origin	Title VI of the Civil Rights Act of 1964 (45 USC §§ 2000d-2000d-4)	34 CFR Part 100
Discrimination on the basis of sex	Title IX of the Education Amendments of 1972 (20 USC §§ 1681-1683)	34 CFR Part 106
Discrimination on the basis of handicap	Section 504 of the Rehabilitation Act of 1973 (29 USC § 794)	34 CFR Part 104
Discrimination on the basis of age	The Age Discrimination Act (42 USC §§ 6101 et seq.)	34 CFR Part 110

ALTERNATIVE PROCEDURES

Pursuant to the March 3, 2020, Ransomware Attack on FWISD and the Covid-19 Pandemic

TIME AND EFFORT DOCUMENTATION

In the event that the District's automated systems for

- 1. collecting time and effort certification and
- 2. securing job description approval

are compromised by malware or inaccessible due to pandemic or emergency, the Grants and Development Department will work with Business Intelligence to develop an alternative system for collecting time and effort certification and job description approval from employees, their supervisors, and grant owners. G&D will strive to adhere to the timeline established in the most recent version of the Grants Manual to satisfy or exceed TEA requirements.

TRAVEL INSURANCE

Pursuant to the Covid-19 pandemic, travel insurance may be purchased with grant funds awarded to FWISD.

CONTRACTED SERVICES

If a vendor is unable to provide services as specified in a contract with FWISD due to pandemic or emergency, the vendor may still receive payment from FWISD according to the terms of the contract if the vendor can demonstrate attempts to provide services during the pandemic or emergency.

PARENT AND FAMILY ENGAGEMENT COMPLIANCE

If a campus or department is unable to hold the required number of family engagement meetings during a school year due to pandemic or emergency, the campus or department will be considered to have satisfied the requirements for parent and family engagement if

- 1. the campus or department can demonstrate that it planned to hold the meetings,
- 2. the campus submits its parent compact and family engagement policy, and
- 3. the campus or department can demonstrate that it attempted to communicate with parents during the pandemic or emergency and attempted to provide support to families.



SITE-BASED DECISION-MAKING COMPLIANCE

If a campus is unable to hold the required number of SBDM team meetings during a school year due to pandemic or emergency, the campus will be considered to have satisfied the requirements for SBDM if

- I. the campus can demonstrate that it planned to hold the meetings and
- I. the campus submits documentation for the meetings that it held.

Best practices would be to submit documentation demonstrating that the campus communicated with its SBDM team during the pandemic or emergency and attempted to collect SBDM feedback on decisions related to campus planning. Emails circulated among SBDM team members and virtual meetings are suggested but not required.

PNP EQUITABLE SERVICES ANNUAL INVENTORY COMPLIANCE

If the annual inventory of items purchased for private nonprofit schools with federal funds cannot be conducted by Region II or District staff due to pandemic or emergency, an inventory by PNP staff will suffice if the PNP can demonstrate that the inventory took place.

PNP CONSULTATIONS

If private nonprofit schools and Region II or District staff cannot meet in person to fulfill federal consultation requirements due to pandemic or emergency, the consultation may be conducted via phone, email, or virtual meeting.





DONATION ACKNOWLEDGEMENT

Fort Worth Independent School District is a public school district and is a political subdivision of the State of Texas. The District is not a tax-exempt entity under the Internal Revenue Service (IRS) Code Section 501 (c)(3). However, the District is considered a tax-exempt organization that may receive charitable contributions according to the IRS Code Section 170 (c)(1). This section states that a charitable contribution means a contribution or gift to or for the use of:

“A State, a possession of the United States, or any political subdivision of any of the foregoing, or the United States or the District of Columbia, but only if the contribution or gift is made for exclusively public purposes.”

The District may receive charitable contributions if they are for public purposes, such as benefiting a group and not an individual. Contributions may be made to the District, District schools, District departments, or various District groups. These charitable contributions are deductible by the contributor on their tax return.

Please note, contributions made to various parent or community organizations, such as PTAs and Booster Clubs, are not contributions to the District. Since these organizations are separate entities from the District, the District's tax-exempt status does not apply to these organizations. These organizations must apply for their tax-exempt status under IRS Code Section 501(c)(3). Evidence of their tax-exempt status would be a Determination Letter from the IRS. When a PTA or Booster Club donates monetary or non-monetary items to the District, then that donation is considered a contribution to the District.

Name of Contributor (Company or Person): _____

Organization: _____

Phone Number: _____

Address: _____

Email Address: _____

Donation Type: ☐ Check ☐ Cash ☐ Gift in kind
☐ Equipment ☐ Vehicle

If monetary, amount: \$ _____

Detailed Description/Purpose of Donation Item(s):

Campus/Department Use Only

This form should be used to record all monetary donations received by your campus/dept. Donations of \$10,000 or less may be received directly from the donor. Do not send this form to the Dept. of Community and Strategic Partnerships. File a copy with school/department finance records.

Signature/Title District Employee: _____

Phone: _____

Receipt # Issued: _____

School/Dept: _____

Finance Secretary: _____

Date: _____

Note: This is a two-page form. Complete page 2 if applicable.



Intent to Apply For Grant Funding

[Clear Form](#)
[Submit Form](#)

District policy requires that all grants and gifts be reported. Based on the size of the grant, various approvals or procedures are required. Please complete this form to report all grant requests or receipts.

What is the grant name?

Is there a CDFA or RFA # (if known)?

What are the grant's start and end dates?

Start: _____ End: _____

What is the grant application due date?

What schools or departments are impacted?

What will the funds be used for?

- ☐ Instruction
 ☐ Reading
☐ Math
 ☐ Science
☐ Social Studies
 ☐ English Language Arts
☐ Other: _____

Who is providing the funds?

- ☐ State
 ☐ Federal
☐ Corporate/Foundation
 ☐ Private
☐ Other: _____

What is the amount of the grant?

\$ _____

Are matching funds required?

☐ Yes ☐ No

\$ _____ Source: _____

Do you need assistance from the Grants Department?

☐ Yes ☐ No

If so, who is contact? _____

Is this grant in support of a Blue Zone Approved School?

☐ Yes ☐ No

Please print, sign and return this form to the Grants & Development Department:

100 N. University Drive, Suite SW204
 Fort Worth, TX 76107
 Office 817-814-2281 Fax 817-814-2285
 E-mail grants@fwisd.org

Principal or Manager:		Date:	
Contact:		School or Dept.:	
Title:		E-mail:	
Phone:		Fax:	

(Approvals in this section will be obtained by the Grants Department)

Senior Officer
Grants & Development

CFO Finance and Business

Chief Academic Officer

Chief of Secondary Schools

Chief of Elementary Schools



Intent to Apply For Grant Funding

PROJECT SUMMARY PAGE

(Required if grant is greater than \$2,500)

Please contact the Grants Department if you need assistance completing this page.

**Project
Summary**

Goals

Objectives

**Grant
Development
Meeting Dates
(if scheduled)**

**Reporting
Requirements
(if known)**

**Regional
Partners (list &
describe)**

Grants Department Support
817.814.2280

Grants Department SharePoint
www.fwisd.org/GrantsResources