

<b>TOPEKA PUBLIC SCHOOLS</b>	<b>REGULATION 2950-01</b>
<b>SUBJECT:</b>	<b>DATE OF ISSUE: 06/18/80</b>
<b>ADMINISTRATION OF FEDERAL GRANT AWARDS</b>	<b>REVISIONS: 04/18/97; 11/08/02; 02/04/10; 04/ 13 /15; 06/26/16</b>
	<b>PREPARING OFFICE: FISCAL SERVICES</b>

**I. PURPOSE**

- A. To define the method for grant applications and responsibility in the administration of grants that have been received and accepted by the Board of Education.**
- B. To ensure that the:**
  - 1. Grants enhance educational programs by obtaining funding to support District programs and initiatives.**
  - 2. Grant proposals are aligned with the district mission and strategic plan.**
  - 3. District is prepared to meet cash matching, in-kind matching, or continuation requirements of the grant.**
  - 4. District is able to implement all aspects of a proposed grant contractual obligations.**
  - 5. Roles of the district employees are clarified.**

**II. PERSONNEL AFFECTED**

- A. The Board of Education**
- B. Superintendent**
- C. Grant Oversight Committee (members designated by Superintendent)**
- D. School district employees wishing to apply for grants.**
- E. Grant Manager**

**III. PROCEDURE**

- A. Preparation and Review of Grant Applications**
  - 1. At the initial stage of preparing a grant proposal, school employees desiring to apply for a grant that involves any individual school/department shall have initial building/department approval and an identified Administrator as Grant Manager. Information of the proposed grant application is then submitted to the Grant Oversight Committee on Initial Grant Request form located in the shared drive in the Grant Oversight Committee folder.**

2. **The Grant Oversight Committee shall review all proposed grant applications and must approve the submission of a grant application. The Grant Oversight Committee review and approval of a proposal is based upon the grant meeting the criteria discussed above in “Purpose”.**
3. **Individual departments are responsible for preparing applications for grants that the district intends to pursue. However, all proposals shall be reviewed by an assigned member of the Grant Oversight Committee prior to submission to ensure the proposed budget includes all appropriate costs and proposed programs meet district mission and strategic plan.**
4. **Final proposals shall be reviewed and approved in writing by the Superintendent, or the Superintendent’s designated representative, prior to submission to government agencies or other funding sources.**
5. **Upon receiving notice that a grant has been awarded, the responsible Grant Manager must send an electronic copy to the Grant Oversight Committee’s folder**
6. **Upon receiving notice that a grant has been awarded, the responsible Grant Manager must place notice of the grant award on the Board of Education agenda for approval. The information includes the actual award document and a summary page with: name of award, dollar amount of award, recommended action (accept or deny), district employee to contact for detail information, matching requirements and a brief summary of the programs approved.**
7. **The Board of Education is the only body that may accept grant funding.**

**B. Business Office Post Award Procedures**

1. **Verify the specifications of the grant or contract. The Director of Budget & Grant Accounting shall review the terms, time periods, award amounts, and expected expenditures associated with the award. A *Catalog of Federal Domestic Assistance* (CFDA) number shall be determined for each award for external audit purposes. All reporting requirements under the contract or award shall be summarized.**
2. **Create new general ledger account numbers. The Director of Budget & Grant Accounting shall establish new accounts for the receipt and expenditure categories in line with the grant or contract budget, and notify the Grant Manager of the applicable account strips.**
3. **Gather documentation. See the following section, “Document Administration”, for details.**

**IV. Compliance with Laws, Regulations, and Provisions of Awards**

- A. **TPS recognizes that as a recipient of federal funds, the District is responsible for compliance with all applicable laws, regulations, and provisions of contracts and grants.**

- B. To ensure that the District meets this responsibility, the following policies apply with respect to every grant or contract received:**
- 1. For each federal award, an Administrator within the department responsible for administering the award will be designated as "Grant Manager."**
  - 2. Each Grant Manager shall have training on grant management prior to beginning his or her role as a Grant Manager (or as early in their functioning as a grant manager as practical). Grant managers shall have additional training if needed for specific grants.**
  - 3. The Grant Manager shall take the following steps to identify all applicable laws, regulations, and provisions of each grant and contract:**
    - a. Read each award and prepare a summary of key compliance requirements and references to specific laws and regulations.**
    - b. The Grant Manager will communicate grant requirements to those who will be responsible for carrying them out, or impacted by them.**
    - c. Review 2 CFR Part 200 for applicable compliance requirements. The Grant Oversight Committee will contain 2 CFR Part 200 on the shared drive in their file.**
  - 4. A member of the Grant Oversight Committee will provide annual training on grant management to Grant Managers. The training will discuss 2 CFR Part 200 requirements and applicable changes.**
  - 5. The Grant Manager shall take all reasonable steps necessary to identify applicable changes in laws, regulations, and provisions of contracts and grants. Steps taken in this regard shall include, but not be limited to, reviewing subsequent grant and contract renewals, and communications with federal awarding agency personnel.**
  - 6. The Grant Manager shall provide the Director of Budget & Grant Accounting a detailed budget for the grant.**
  - 7. The Grant Manager shall inform the independent auditors of applicable laws, regulations, and provisions of contracts and grants. The Grant Manager shall also communicate known instances of noncompliance with laws, regulations, and provisions of contracts and grants to the auditors.**

**V. Document Administration**

- A. For each grant/award received by TPS from a federal, state, or local government agency, a file of documents applicable to the award shall be prepared and maintained. The responsibility for assembling each master file shall be assigned to the Director of Budget & Grant Accounting and the Grant Manager.**
  
- B. The master files assembled for each government award shall include all of the following documents:**

**From the Grant Manager**

- 1. Copy of the initial application for the award and corresponding budget**
- 2. All correspondence to and from the awarding agency post-application, leading up to the award**
- 3. The final, approved budget and program plan, after making any modifications**
- 4. The grant agreement and any other documents associated with the initial making of the award**
- 5. Copies of pertinent laws and regulations, including awarding agency guidelines, associated with the award**
- 6. Subsequent grant modifications (financial and programmatic)**
- 7. Copies of program and financial reports**
- 8. Subsequent correspondence to/from the awarding agency**
- 9. Results of any monitoring visits conducted by the awarding agency, including resolution by TPS of any findings arising from such visits**
- 10. Correspondence and other documents resulting from the closeout process of the award**

**From the Director Budget & Grant Accounting**

- 1. Grant Award**
- 2. Board of Education agenda information and Board approval**
- 3. The final, approved budget**
- 4. Audit/monitoring-related documents**
- 5. Subsequent grant modifications**
- 6. Copies of program and financial reports**
- 7. Correspondence contract information of the awarding agency**

**VI. Closeout of Federal Awards**

**TPS will close out an award when it determines that all applicable administrative actions and all required work of the award has been completed. The actions to complete this process at the end of the period of the performance are:**

- A. TPS must submit, no later than 90 days after the end date of the period of performance, all financial, performance and other reports as required by the terms and conditions of the award.**

- B. Unless the awarding agency authorizes an extension, TPS must liquidate all obligations incurred under the award not later the 90 calendar days after the end of the grant period.**
- C. TPS must promptly refund any balances of unobligated cash that TPS is not authorized to retain.**
- D. TPS must make any adjustments to financial, performance and other reports for any adjustments to the share of costs after closeout reports are received.**
- E. TPS must account for any real and personal property acquired with grant funds.**