

TOPEKA PUBLIC SCHOOLS	REGULATION 3000-20
SUBJECT:	DATE OF ISSUE: 03/25/19
HEAD START	REVISIONS:
	PREPARING OFFICE:
	FISCAL SERVICES

I. PURPOSE

To ensure that Topeka Public Schools (TPS) will oversee and safeguard the Department of Health & Human Services (HHS) funds available for the educational care of preschool children in the Head Start (HS) program.

A. Develop Fiscal Regulations to;

- Detail the policies and procedures to be followed by the management team to fulfill their accountability requirements.
- Safeguard HHS funds by effective financial administration by TPS management team.
- Be subject to federal and local requirements pertaining to financial management of the HS program.
- Ensure that the HS management team will follow operating policies and regulations in their areas of responsibility.
- Ensure that the HS management team will be accountable for areas of responsibility under their control.

B. Personnel Affected

- Topeka Public Schools Administration
 - Board of Education
 - Superintendent
 - General Director Early Childhood Education
 - General Director of Fiscal Services
 - Director Budget & Grant Accounting
 - Early Childhood Accountant
- Head Start Program
 - HS Principal
 - HS Compliance Coordinator
 - Administrative Assistant to Principal
- Head Start Policy Council

C. Administration and Accountability

TPS and HS management will assume the fiscal responsibility for the HS program. The day-to-day responsibility for overseeing the program will be administered by the HS Principal and Director of Early Childhood Education. All personnel will follow the regulations regarding Head Start funds.

D. Consequence of Non-Compliance

Failure to meet the fiscal standards could result in loss of Federal funds.

II. APPLICABLE REGULATIONS

A. Federal

Head Start Act
Head Start Program Performance Standards
Uniform Guidance

B. Topeka Public Schools

TPS Policies
TPS Regulations
(Available online at www.topekapublicschools.org.)

C. Office of Head Start

Head Start Program Performance Standards

III. SUPPLEMENTAL MANAGEMENT HHS GRANT AWARDS

A. Head Start Grant Application Process

1. The grant application is written each year and is due to the Administration for Children and Families Office of Grants Administration by August 1st, except HHS may approve other dates.
2. The HS grant normally runs from November 1st through October 31st, except HHS may approve other grant periods.
3. The grant application must be approved by the following:
HS Principal, General Director Early Childhood Education, TPS Grant Committee, HS Policy Council, Board of Education
4. Grant application procedures:
 - a. Previous year's information of account totals is utilized to draft a preliminary budget.
 - b. Information is adjusted for program needs, pay adjustments and benefits, if applicable.
5. To create the grant application the following resources are used:
 - a. Head Start Enterprise System (HSES)
 - b. Appropriate Federal forms
 - c. Community Needs Assessment
 - d. Self-Assessment
 - e. Policy Council
 - f. Head Start Personnel
 - g. TPS Human Resources
 - h. TPS Business Office

B. Budget

1. The budget is determined by the needs of the program and available funding.
2. The following is used to set up a budget:

- a. Community Needs Assessment
 - b. Previous Year's Budget
 - c. Self- Assessment
 - d. Projected Salary and fringe benefits amounts
3. The HS Principal submits the budget to the General Director of Early Childhood Education for review and approval.
 4. The budget is presented with the grant application to the TPS Grant Committee for their review and approval.
 5. The HS Principal submits the budget to the Policy Council for their review and approval.
 6. The budget is presented to the Board of Education for review and approval
 7. Revision of Head Start Budget by HHS
 - a. HHS may restrict transfer of funds among direct cost categories for cumulative transfers exceeding 10%.
 - b. An approved budget summarizes the financial aspects of the program as approved during the award process. It may include the Federal and non-Federal share, or just the Federal share, depending upon the awarding agency requirements. The budget must be related to performance for program evaluation purposes whenever appropriate.
 - c. Recipients are required to report deviations from budget or program scope or objective, and request prior approval from the Federal awarding agency for budget and program plan revisions.
 - d. For non-construction awards, HS must request prior approvals from HHS for one or more of the following budget related reasons:
 - A change in the scope or objective of the program
 - Change in key personnel specified in the application
 - The disengagement from the program for more than three months, or a 25% reduction in time devoted to HS by the HS Principal.
 - The transfer of funds budgeted for participants support costs to other categories of expenses.
 - Unless approved in the application, the sub-awarding, transferring or contracting out of any work under the HS award.
 - Changes in the amount of approved cost-sharing or matching provided by the non-Federal entity.

C. Procedure for Draw-Down of HHS Funds approved for the TPS Head Start Program

1. HHS fund may not be used for any purpose other than the HS program needs.
2. Funds will be drawn down at least once a month, based upon HS financial reports, to cover monthly costs.
3. HS Accountant submits monthly expenditure report to Director of Budget and Grant Accounting
4. Once the expenses are determined, the Director of Budget & Grant Accounting completes the "Request for Payment" on-line request.
5. In the absence of the Director of Budget & Grant accounting the General Director of Fiscal Services has the authority to request funds on-line.
6. The Director of Budget & Grant Accounting verifies the HHS cash and TPS cash balances match.

7. A copy of the “Request for Payment” form is filed in the business office and a copy is kept on the shared on-line folder for HS with HS Principal and General Director Fiscal Services.
8. Funds are posted to the HS project by TPS account receivable staff. (See TPS: Policy Cash Receipts).
9. A guide to the Payment Management System is on file in the shared HS folder.

IV. FORMS

A. Federal Forms

1. Application SF-424
2. Budget Information SF-424a
3. Request for Payment
4. Financial Reporting Form SF-425
5. Financial Reporting Federal Financial Report (FFR)

B. Topeka Public Schools Forms

1. Accounts Payable (See TPS Policy: Accounts Payable)
2. General Accounting (See TPS Policy: General Ledger & Chart of Accounts)
3. Purchasing (See TPS Policy: Purchasing))

Find policies at: www.topekapublicschools.net

C. Child & Adult Care Food Programs (CACFP)

1. Request for Reimbursement Form

V. PURCHASING

A. Topeka Public Schools (See TPS Policy: Accounts Payable)

Find policies at: www.topekapublicschools.net

VI. ACCOUNTING & TRACKING FUNDS

A. In-Kind Contributions (Non-Federal Share)

1. A match of 20% of the total grant budget (which includes the federal funds plus the non-federal share total) must be from a non-federal source. An alternative method of calculation is to multiply the federal fund amount by 25%.
2. Information provided in the grant illustrates how the in-kind obligation will be met.
3. Factors affecting allowability of matching expenditures (whether cash or in-kind) are the same as for the Federal expenditures in that the costs must be reasonable, allocable, and necessary for the accomplishment of the project objectives and are allowable under the applicable cost principles.
4. The amount of the in-kind is entered into the In-Kind Budget Report for the current grant year.
5. HS will maintain an in-kind summary, with applicable documentation to support the amounts on the summary, on a monthly basis.
6. In-kind claimed for HS cannot be used as a match for other grants.
7. A quarterly in-kind report is presented to the HS Policy Council.

B. Administrative Costs

1. Administrative Costs must not exceed 15% of the total HS budget, including federal and non-federal funds, except HHS may approve a different percentage.
2. Using the administrative costs set down in the grant each year, a budget is determined.
3. A monthly administrative costs report, including administrative salary portions and review of invoices for administrative costs, is available to the HS Policy Council.

C. CACFP (USDA) Counts

1. Snack and meal counts are maintained daily.
2. A monthly CACFP count report is created.
3. Monthly student counts are used to determine the reimbursement amount.
4. Before a claim is filed, the reimbursement form is reviewed and approved by the HS Compliance Coordinator
5. A claim is processed online with CACFP for reimbursement.
6. All CACFP rules and regulations are followed.

VII. SUPPLIES AND MATERIALS

A. Program Needs

1. Supply needs of the program are determined by using input from the Self - Assessment, HS Policy Council, HS Performance Plans, along with HS personnel.

B. HS Supplies

1. Supplies are defined as anything that is consumable, such as art supplies, facial tissues etc.
2. HS Principal orders the supplies with their allotted amounts of budget with the help of the Early Childhood Accountant. Requisitions are created in the TPS on-line requisition system.
3. Requisitions are approved by the HS Principal and General Director Early Childhood Education.
4. The requisitions are processed by the TPS Purchasing Department who generate purchase orders (PO).
5. Approved PO copies are forwarded to the accounts payable department to validate receipt and authorize processing payment.

C. CACFP Supplies

1. CACFP supplies are used only for snack and meal service.

VIII. INVENTORY & EQUIPMENT MANAGEMENT

A. Inventory and Equipment Management

1. Federal grant regulations require written policies and procedures for managing and controlling equipment acquired in whole or in part by HS grants.

2. Equipment must have a useful life of more than one year and an acquisition cost of \$5,000 or more per unit per federal guidelines. TPS has a lower acquisition cost (See TPS regulations). A record of capital assets is maintained by the TPS Business Office.

B. Inventory Control Carried Out by HS Staff

1. Classroom supplies are managed and maintained by classroom staff.
2. Consumables are not inventoried.
3. Playground equipment is managed and maintained by TPS; playground equipment is inspected regularly by individuals experienced and credentialed in playground inspections.
4. Office equipment is managed by the HS Principal and maintained by TPS.
5. Periodically and external audit firm with experience in HS inventory requirements is engaged to complete an equipment inventory and property valuation report

C. Equipment and furniture, etc. are labeled (tagged) with inventory control number for HS, the TPS Business Office maintains the equipment records which include:

1. Description
2. Serial Number
3. Source of Funding
4. Acquisition date
5. Cost
6. Accounting Coding to identify source of fund (ex. HS)
7. Location
8. Disposal date if applicable
9. Donated equipment and furniture

D. HS acquired equipment is used in the HS program.

E. A detailed physical inventory of equipment and furniture is completed every two years by an external audit firm.

F. Safeguards are in place to protect equipment

1. Insurance is obtained for equipment.
2. HS schools are adequately protected by locks and security systems.
3. HS Office is adequately protected by locks and a security system.
4. TPS internal controls protect against loss, damage, or theft.

G. Equipment Disposal

1. There is no federal requirement for disposing of supplies with a current per unit fair market value of less than \$500.00
2. TPS has a regulation for disposing of equipment (See TPS Regulation: Fixed Asset Inventory).
3. For equipment with a current per unit fair market value of \$500 or more, HS must request disposition instructions from the Federal grant awarding office.
4. Records for equipment with Federal funds must be retained for at least three years after final disposal.

IX. REPORTS

A. Federal Reports

1. Financial Status Report (SF-425)
 - a. Semi-annual cumulative Financial Status Reports are submitted per current HHS guidelines; a final SF-425 is due within ninety days after the end of the annual budget period. The completed SF-425 is sent to the Director of Budget & Grant Accounting for review and approval before being approved and submitted electronically.
 - b. The SF-425 is prepared and forward to the following individuals for their approval:
 - i. Board of Education President or Clerk of The Board
 - ii. Superintendent

B. Local Reports

1. Monthly reports can be generated by HS at any time.
 - a. Expenditure Reports and Trial Balance
2. HS Prepares Monthly Reports for Policy Council and TPS School Board review
 - a. Summary Budget Report
 - b. USDA snack/meal report
 - c. Credit card expenditure report
3. HS Prepare Internal reports for record-keeping
 - a. HS Budget reports from TPS computerized system
4. Director Budget & Grant Accounting prepares Payment Management System (PMS) transactions/receipts record per monthly expenditure report prepared by Early Childhood Accountant.
 - a. Final transaction records kept in Shared Electronic File
5. Generated Reports Distributed:
 - a. Budget Reports
 - i. HS Principal
 - ii. Policy Council
 - iii. Board of Education
 - b. HS YTD account balances
 - i. HS Principal
 - ii. HS Policy Council
 - c. Copies of Grant Awards
 - i. TPS Board of Education
 - ii. HS Policy Council
 - iii. HS Principal
 - iv. Director Budget & Grant Accounting
6. Audit Reports
 - a. Audit reports are submitted in accordance to federal guidelines and requirements (Federal Audit Clearing House)
 - b. Electronic copies of final audit reports are forwarded to HS Regional Office, Grants Management Specialist
 - c. TPS is audited annually and HS is included as a major program under Single audit guidelines.

- d. The current and previous four fiscal year audit(s) can be viewed on line at www.topekapublicschools.net