

FEDERAL GRANT FUNDS

Purpose

The Monterey County Office of Education (MCOE) is mandated to adopt written procedures for all grants awarded by the federal government such as formula grants (e.g., Title I funding, Part B of the Individuals with Disabilities Education Act) and discretionary grants. This Board Policy and corresponding Administrative Regulation 3230 provides the procedures required for compliance.

Board Responsibility

The Monterey County Board of Education (County Board) recognizes MCOE's responsibility to maintain fiscal integrity and transparency in the use of all funds awarded through federal grants. The Monterey County Superintendent of Schools (County Superintendent) ensures that MCOE complies with all requirements detailed in any grant agreement with an awarding agency and with the federal Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards specified in 2 CFR 200.0-200.521 and any stricter State laws, administrative regulation, and County Board policy.

Process

Any goods or services purchased with federal funds are required to be reasonable in cost and necessary for the proper and efficient performance or administration of the program.

The County Superintendent or designee should ensure that MCOE's financial management systems and procedures provide for the following: [2 CFR 200.302]

1. Identify MCOE accounts of each federal award received and expended and the federal program under which it was received
(cf. 3100 - Budget)
2. Provide accurate, current, and complete disclosure of the financial and performance results of each federal award or program in accordance with the reporting requirements of 2 CFR 200.327 and 200.328
(cf. 3460 - Financial Reports and Accountability)
3. Retain records and supporting documentation that adequately identify the source and application of funds for federally funded activities, including information pertaining to federal awards, authorizations, obligations, unobligated balances, assets, expenditures, income, and interest

(cf. 1340 - Access to School Records)

(cf. 3580 - School Records)

4. Maintain effective controls and accountability for all funds, property, and other assets and assurance that all assets are used solely for authorized purposes
5. Compare actual expenditures with budgeted amounts for each federal award
6. Maintain written procedures to implement provisions governing payments as specified in 2 CFR 200.305
7. Maintain written procedures for determining the allowance of costs in accordance with 2 CFR 200.400-200.475 and the terms and conditions of the federal grant award

(cf. 3400 - Management of Assets/Accounts)

The County Superintendent or designee should develop and implement appropriate internal control processes to reasonably assure that transactions are properly executed, recorded, and accounted for so that MCOE can prepare reliable financial statements and federal reports, maintain accountability over assets, and demonstrate compliance with federal laws, regulations, and conditions of the federal award. [2 CFR 200.61, 200.62, 200.303]

Equipment purchased with federal funds shall be properly inventoried and adequately maintained to safeguard against loss, damage, or theft of the property.

(cf. 3270 - Sale and Disposal of Books, Equipment and Supplies)

(cf. 3440 - Inventories)

(cf. 3512 - Equipment)

All staff involved in the administration or implementation of programs and activities supported by federal funds are required to receive information and training on the allowable use of federal funds, purchasing procedures, and reporting processes commensurate with their duties.

(cf. 4131 - Staff Development)

(cf. 4231 - Staff Development)

(cf. 4331 - Staff Development)

The California Department of Education (CDE) is required under Education Code 64001 to monitor MCOE's compliance with legal requirements for federal categorical programs. This monitoring is accomplished through the Federal Program Monitoring process, which is based on a combination of data and document reviews and on-site visits.

Program Evaluation

MCOE submits performance reports to the awarding agency in accordance with the schedule and indicators required for that federal grant by law and the awarding agency. As required, such reports may include a comparison of actual accomplishments to the objectives of the federal award, the relationship between financial data and performance accomplishments, the reasons that established goals were not met if applicable, cost information to demonstrate cost effective practices, analysis and explanation of any cost overruns or high unit costs, and other relevant information.

The final performance report is required to be submitted within 90 days after the ending date of the grant; however, MCOE may request an extension of the due date for any performance report for justifiable reasons. [2 CFR 200.301,328]

(cf. 0500 - Accountability)

(cf. 6190 - Evaluation of the Instructional Program)

Legal References:

EDUCATION CODE

1620-1630 *County office of education budget approval*

42122-42129 *Budget requirements*

CODE OF FEDERAL REGULATIONS, TITLE 2

180.220 *Amount of contract subject to suspension and debarment rules*

200.0-200.521 *Federal uniform grant guidance, especially:*

200.1-200.99 *Definitions*

200.100-200.113 *General provisions*

200.317-200.326 *Procurement standards*

200.327-200.329 *Monitoring and reporting*

200.333-200.337 *Record retention*

200.400-200.475 *Cost principles*

200.500-200.521 *Audit requirements*

CODE OF FEDERAL REGULATIONS, TITLE 34

76.730-76.731 *Records related to federal grant programs*

CODE OF FEDERAL REGULATIONS, TITLE 48

2.101 *Federal acquisition regulation; definitions*

Adopted: 04/10/19