

Hamilton County School District Uniform Grants Guidance Procedures Manual

2020-2021

OVERVIEW

The following procedures have been compiled as part of this manual to promote compliance with the provisions of the Federal requirements promulgated in the Uniform Grants Guidance. Also, certain procedures have been presented that provide effective internal controls regarding the financial operations of the District with specific focus on federally awarded funds. Most of the procedures herein are related to the fiscal management of funds awarded by Federal agencies.

CASH MANAGEMENT PROCEDURES FOR FEDERAL GRANTS AWARDED

Responsible Parties

Cash management practices regarding Federal grants are the responsibility of the Director of Business Services (DBS). The actual source documents that cash management decisions are based upon are created and maintained by other personnel within the Finance Office responsible for the posting of accounts payable and net payroll disbursements. Requests for cash draws are made monthly by the Fiscal Assistant – Federal Grants in the Florida Grants System (FLAGS) and amounts requested are based on project expenditures incurred fiscal year to date (FYTD) net of reimbursements received FYTD. The consultants contracted under Northeast Florida Educational Consortium (NEFEC) maintain the accounting system (Skyward) used to document expenditures on subsidiary ledgers for individual Federal projects.

Advances vs. Reimbursement

Advances

2 CFR Section 200.305 (b)(1) authorizes cash advances to a non-Federal entity like our district provided we maintain written procedures and a financial management system that demonstrates our ability to minimize the time elapsing between transfer of funds to our entity and disbursement of such funds to contractors, employees, and providers of other goods and services. This document satisfies the written procedures requirement and Skyward and FLAGS satisfy the financial management system requirement. Further, DOE's Green Book Section C-3 requires that cash should not be requested through FLAGS more than three (3) business days prior to the anticipated date of disbursement. The posting date of funds received from DOE into our New Operating Bank Account will begin the 3-day period and the posting date of the disbursement (accounts payable/payroll run) will determine if the 3-day disbursement was satisfied in addition to the posting date of transfers made into our Accounts Payable (revolving) and Payroll bank accounts.

Other Federal funds received from other Federal entities beyond the United States Department of Education are limited and currently do not provide a cash advance option or if available has not or will not be pursued by the district. Such funding sources are for ROTC, National School Lunch Act, and various small grants.

Reimbursements

In acknowledging the arduous mandates noted above for receipt of cash advances from the USDOE as received through the Florida Department of Education (pass-through entity), the district has embraced and enacted a cash management philosophy that requests actual monies monthly based upon the previous month's accounts payable and payroll transactions. The following sections describe the established procedures to ensure compliance with this philosophy.

Requesting Actual Obligations

To minimize or eliminate the possibility of an unintentional advance of Federal funds, only actual expenditures that are posted to date in our accounting system (Skyward) will be utilized in calculating the amount requested.

Correcting Journal Entries

An event might occur where a previous posting of expenditures requires a correcting journal entry that results in the transfer of the obligation between Federal and non-Federal funding sources or between Federal sources. Any changes will be 'flushed out' in subsequent cash draws as total expenditures FYTD by project are compared to reimbursements received FYTD to determine the correct amount to request through FLAGS.

Conclusion

The District will continue to monitor its cash management practices ensuring compliance with Federal regulations and to recognize any best practices realized through communication with other school districts and the Florida Department of Education. These procedures as presented are effective as of July 1, 2020 and remain in effect until superseded.

BANK RECONCILIATIONS

Responsible Parties

The Fiscal Assistant - Purchasing is responsible for reconciliations of all bank accounts. The DBS reviews and approves all reconciliations. Approval is documented by signature and the date of approval and maintained in the Bank Reconciliation file by the Fiscal Assistant – Purchasing.

Preparation of Bank Reconciliations

The Fiscal Assistant – Purchasing receives and opens the bank statements. Bank reconciliations are prepared monthly by the Fiscal Assistant - Purchasing. Book balances and transactions by source are automatically calculated by Skyward and bank account transactions are imported from the bank website.

Discrepancies are addressed with any pertinent personnel within the Finance Office by the Fiscal Assistant - Purchasing. If a discrepancy is unresolved, the amount is identified on the bank reconciliation and then addressed by the DBS. Manual adjustments are needed periodically to account for insurance wires that have occurred but not yet been recorded.

INDIRECT COSTS

Responsible Parties

Computation of the annual Federal Indirect Cost rate is the responsibility of the DBS. During the annual preparation of budgets of Federal grants to be submitted to the Florida Department of Education for review and approval, the respective grant administrators within the district are responsible for the calculation and inclusion of the indirect cost charged to their respective Federal grant. The Superintendent shall sign the annual Certification and Request for Authorized Indirect Cost Rate.

Type of Indirect Cost Rate

The district utilizes the Plan B option allowed by the Florida Department of Education. Under Plan B, both an unrestricted and restricted indirect cost rate is calculated.

Computation of Federal Indirect Cost Rate

The Florida Department of Education (FDOE) provides a template for the computation of the restricted and unrestricted indirect cost rates utilizing the simplified allocation method defined in Appendix VII to Part 200, CFR. Included in the template is the certification page signed by the Superintendent that is submitted to FDOE for approval. The template is in EXCEL format and requires the input of values by function and by type of expenditure. A copy of the current year Indirect Cost application with instructions and award notification from FDOE can be found in Finance along with copies of historical calculations.

Application of Federal Indirect Cost Rate

Budgetary and Accounting Process

During the preparation of grant applications, grant administrators in the District apply the approved restricted indirect cost rate to their proposed budgets. The Fiscal Assistant – Federal Programs calculates indirect costs by project on a monthly basis using expenditure detail obtained from Skyward and the approved indirect cost rate and proposes a journal entry to record. The entry is reviewed and posted by the DBS. Cash draws related to indirect costs are requested in the same manner as described above under cash management procedures.

Closing of Projects

Prior to the closing of a Federal project with FDOE by submitting a final FA-399 form, the Fiscal Assistant – Federal Programs will prepare a final indirect cost calculation for the project which is approved in the manner described above.

DETERMINATION OF ALLOWABILITY OF COSTS

Responsible Parties

Grant administrators and the DBS are responsible for ensuring that costs charged to Federal projects are allowable, necessary, and allocable.

Budgetary Process

As grant applications are prepared, the respective grant administrator reviews all proposed expenditures to ensure that they are allowable with respect to the scope, goals, and objectives of that specific Federal project. Furthermore, the grant administrators ensure that all proposed expenditures are in conformance with the limitations or exclusions established within the principles of the Federal award. Specific expenditures are identified such as the type of personnel to be staffed, contracted professional services to be obtained, and large capital purchases (i.e. a vehicle).

Factors Considered for Allowable Costs

The type of expenditures must first not be disallowed under any specific category identified in Section 200.420 of the Code of Federal Regulations (e.g. purchase of alcohol). Also, any specific limitations or exclusions of the grant requested must be considered and the objectives of the grant must be achieved. The submission of the grant to the Florida Department of Education and any feedback and reaction to such feedback is part of the process in assuring that expenditures approved through the budgetary process are necessary and reasonable for the performance of the Federal grant.

Direct Cost

Section 200.413, CFR, addresses the provisions to be considered as to whether certain costs can be treated as a direct cost of a Federal grant. As stated previously, detailed descriptions of intended expenditures are provided to the Florida Department of Education during the budgetary phase of the grant and any expenditures that may not be conclusive as to their indirect or direct status such as administrative staff is reviewed and approved/disapproved.

Indirect Cost

As described elsewhere in this manual, the District is allowed to assess an indirect cost charge based on an approved indirect cost rate on most pass-through Federal grants from the Florida Department of Education. In accordance with Section 200.403, CFR no direct charges to a grant shall be made that are of the same purpose that have been charged to the grant as an indirect cost. In the district, costs allocated as indirect costs are highly restrictive to district administrative services that are not directly involved or charged to grants (e.g. Finance and HR personnel). Also, all termination benefits of departing employees funded by grants are charged to the General Fund and then allocated to grants by the indirect cost rate.

Review of Expenditures During Grant Period

Types of commodities and services allowed under a Federal project are identified by the Federal government through the Uniform Grants Guidance Section 200.400 Subpart E.

End of the Year Obligations

As a project period nears the end of the allowed period based on the project award notification from FDOE, the grant administrator must assure that any expenditures to be paid from the current project grant are allowable based on the timing as to when the obligation has occurred. The following table provides guidance for certain types of expenditures:

Type of Expenditure	Timing of Expenditure for Grant Purposes
Property including Tangible Personal Property	On the date which the District makes a binding written agreement to acquire the property.
Salaries of employees working on grant	The date of the actual work performed.
Contracted Professional Services and Other Services	On the date which the District makes a binding written agreement to obtain the work performed.
Travel	The date which the travel occurs.
Rental of property	The date the property is used.

Amendments to Original Budget

Amendments to the budget will be submitted to FDOE in accordance with requirements presented in FDOE's Green Book. The appropriate amendment is completed and signed by the appropriate department personnel and submitted to FDOE for approval. When considering an amendment, the grant administrator must consider the impact on originally considered endeavors that will now not be funded due to the amendment.

CONFLICTS OF INTEREST STANDARDS

The District's Board Policy 6.37 addresses professional ethical standards. In addition, the annually Board-approved Employee Handbook includes an anti-fraud policy that outlines duties for identifying and reporting incidents of unethical behavior resulting in fraud. As purchasing agent of the District, the DBS must complete a Statement of Financial Interests Form where all financial interests are listed.

Furthermore, these procedures hereby adhere to the requirements prescribed in Section 200.318(c)(1) of the Uniform Grants Guidance. Board Policy 7.14(12) Conflict of Interest in Purchasing provides for disciplinary action for any employee that violates conflict of interest provisions.

PROCUREMENT STANDARDS

This section will outline the unique process that must be followed to account for the additional procurement standards required under the Uniform Grants Guidance when Federal funds are to be expended for goods and services. In some instances, local and State law are more restrictive than what is expected under the Uniform Grants Guidance provisions within CFR 2 Section 200. Additionally, such provisions have no effect on procurement practices outside of Federally awarded funds.

CFR 2 Section 200.318 requires the District to document their procurement procedures including how Board approved purchasing policies and procedures conform with the requirements of the Uniform Grants Guidance.

Finally, the procedures herein do not consider any procurement for construction activities. If the rare instance of Federal funds being available for construction activities occurs, current District procedures for obtaining professional architectural and general contractor services will satisfy the requirements within the Uniform Grants Guidance. Any resolution of conflicts with provisions prescribed in the Uniform Grants Guidance will be approved by the Federal awarding agency or the State pass-through entity in accordance with Section 200.324 of the Uniform Grants Guidance.

Responsible Parties

Grant administrators and their office staff are responsible for requests to procure goods and services. The DBS is responsible in ensuring that the provisions of this section have been met prior to releasing a purchase order or approving a corporate card transaction coded to a Federal project.

Coordinating Purchasing Thresholds under UGG with Board Policy

Section 200.320 of the Uniform Grants Guidance establishes three levels of purchases:

Price Range	Requirement
\$0.00 - \$2,999.99	Micro-purchases
\$3,000.00 - \$149,999.99	Small Purchases
\$150,000.00 or Greater	Sealed bids/competitive proposals (Simplified Acquisition Threshold)

Board policy and administrative procedures, in compliance with State law, establish the following thresholds for purchases:

Price Range	Requirement
\$0.00 - \$2,999.99	No quotation is required.
\$3,000.00 - \$9,999.99	Three or more documented verbal or written quotes are required and approval by the DBS.
\$10,000.00 - \$35,000.00 (or Section 287.017, F.S., Category Two Threshold, whichever is greater.)	Three or more written quotes are required and approval by the DBS.
\$35,000.01 or Greater	Sealed bids/competitive solicitations are required in compliance with State law and Board policy.

Coordinated Thresholds

The following are the procedures to be followed based on the expected amount of the purchase. These procedures consider both the coordination of purchasing thresholds and the coordination of competition requirements of the UGG and economic and efficiency opportunities available through exempted practices allowed under SBE Rule 6A-1.012. For all purchases totaling \$3,000 or greater, a determination of the allowability of the costs, testament that no conflict of interest exists, and affirmation that minority and small businesses were considered will be documented on the Pre-Procurement Review Form completed prior to the approval of the purchase.

Micro-Purchases

The requirements for a micro-purchase described in CFR 2, Section 200.320(a) are followed.

Less than \$3,000

- No competitive solicitation required if District considers the price/rate reasonable.
- To the extent practicable, District equitably distributes purchases among eligible suppliers.
- A Professional Services Contract (PSC) must be completed as applicable and may be authorized by the DBS.
- New contracts must be added to the regular agenda of the next scheduled Board meeting. All other contracts shall be added to the consent agenda of the next scheduled School Board meeting.

Small Purchases

CFR 2, Section 200.320(b) describes the procedures for Small Purchases. It simply requires that an adequate number of price or rate quotations must be obtained from an adequate number of qualified sources.

\$3,000 to \$9,999.99

- Documented verbal or written quotations obtained from at least three (3) acceptable vendors.
- If quotations are not sought, justification as to the economy and efficiency afforded to the District by using an alternate procurement approach allowed under SBE Rule 6A-1.012.
- A Professional Services Contract must be completed as applicable and may be authorized by the DBS.
- New contracts must be added to the regular agenda of the next scheduled Board meeting. All other contracts shall be added to the consent agenda of the next scheduled School Board meeting.
- Completion of the pre-procurement review form.

\$10,000 to \$24,999.99

- Written quotations obtained from at least three (3) acceptable vendors.
- If quotations are not sought, justification as to the economy and efficiency afforded to the District by using an alternate procurement approach allowed under SBE Rule 6A-1.012.
- A Professional Services Contract must be completed as applicable and may be authorized by the DBS.
- New contracts must be added to the regular agenda of the next scheduled Board meeting. All other contracts shall be added to the consent agenda of the next scheduled School Board meeting.
- Completion of the pre-procurement review form.

\$25,000.00 to \$35,000.00

- Written quotations obtained from at least three (3) acceptable vendors.
- If quotations are not sought, justification as to the economy and efficiency afforded to the District by using an alternate procurement approach allowed under SBE Rule 6A-1.012.
- A Professional Services Contract must be completed as applicable and may be authorized by the DBS.
- New contracts must be added to the regular agenda of the next scheduled Board meeting. All other contracts shall be added to the consent agenda of the next scheduled School Board meeting.
- Completion of the 'CERTIFICATION REGARDING DEBARMENT, SUSPENSION, INELIGIBILITY, AND VOLUNTARY EXCLUSION -- LOWER TIER COVERED TRANSACTIONS' form by the vendor AND a review of the vendor via the Systems for Award Management (SAM) shall be made to ensure the intended vendor has no exclusions from any applicable agencies.
- Completion of the pre-procurement review form.

\$35,000.01 to \$149,999.99

- School Board approval is required prior to the procurement of goods or services. Contracts and Purchase Orders must be placed on the regular agenda of the School Board.
- Sealed bids/competitive solicitations are required.
- If sealed bids/competitive solicitations are not sought, justification as to the economy and efficiency afforded to the District by using an alternate procurement approach allowed under SBE Rule 6A-1.012.
- A Professional Services Contract must be completed as applicable and may only be authorized through approval of the School Board.
- Completion of the 'CERTIFICATION REGARDING DEBARMENT, SUSPENSION, INELIGIBILITY, AND VOLUNTARY EXCLUSION -- LOWER TIER COVERED TRANSACTIONS' form by the vendor AND a review of the vendor via the Systems for Award Management (SAM) shall be made to ensure the intended vendor has no exclusions from any applicable agencies.
- Completion of the pre-procurement review form with the signature of the DBS.

Simplified Acquisition Threshold

\$150,000.00 or Greater

- School Board approval is required prior to the procurement of goods or services. Contracts and Purchase Orders must be placed on the regular agenda of the School Board.
- Before seeking Board approval, a determination will be documented as to whether the proposed purchase should be submitted for review by either the awarding Federal agency or the State-level pass-through entity.
- Sealed bids/competitive solicitations are required.
- The District will adhere to all provisions within the Uniform Grants Guidance regarding purchases exceeding the Simplified Acquisition Threshold.
- A Professional Services Contract must be completed as applicable and may only be authorized through approval of the School Board.

- Completion of the 'CERTIFICATION REGARDING DEBARMENT, SUSPENSION, INELIGIBILITY, AND VOLUNTARY EXCLUSION -- LOWER TIER COVERED TRANSACTIONS' form by the vendor AND a review of the vendor via the Systems for Award Management (SAM) shall be made to ensure the intended vendor has no exclusions from any applicable agencies.
- Completion of the pre-procurement review form with the signature of the Superintendent.

PURCHASING AND CONTRACTING COORDINATED GUIDELINES							
Thresholds	General Guidelines				Federal Guidelines		
	Quotations/ Competitive Solicitations		Professional Service Contracts (PSC)		Category	Pre-Procurement	Suspension/ Debarment
	Requirement	Approval	Requirement	Approval			
Less than \$3,000	N/A.	Approved by the Director of Business Services (DBS).	Required, as applicable.	Approved by the DBS. Added to consent agenda.	Micro-Purchases	N/A.	N/A.
\$3,000 to \$9,999.99	3 documented verbal or written quotations.	Approved by the DBS.	Required, as applicable.	Approved by the DBS. Added to consent agenda.	Small Purchases	Required. Signed by Grant Coordinator.	N/A.
\$10,000 to \$24,999.99	3 written quotations.	Approved by the DBS.	Required, as applicable.	Approved by the DBS. Added to consent agenda.	Small Purchases	Required. Signed by Grant Coordinator.	N/A.
\$25,000.00 to \$35,000.00	3 written quotations.	Approved by the DBS.	Required, as applicable.	Approved by the DBS. Added to consent agenda.	Small Purchases	Required. Signed by Grant Coordinator.	Required. Verify with Systems for Award Management (SAM).
\$35,000.01 to \$149,999.99	Sealed bid required. ¹	Board Pre-approval required. ²	Required, as applicable.	Board Pre-approval required. Added to regular agenda.	Small Purchases	Required. Signed by DBS.	Required. Verify with SAM.
\$150,000.00 or Greater	Sealed bid required. ¹	Board Pre-approval required. ²	Required, as applicable.	Board Pre-approval required. Added to regular agenda.	Simplified Acquisition Threshold ³	Required. Signed by Superintendent.	Required. Verify with SAM.
¹ SBE Rule 6A-1.012, F.A.C, exemptions to competitive solicitations requirements may apply. ² Purchase orders do not require separate approval from the Board when the related contract has already been approved by the Board. ³ A determination must be made as to if the purchase requires Federal or State-level approval.							

ADDITIONAL PROCUREMENT STANDARDS

State Board of Education (SBE) Rule 6A-1.012

Sections under SBE Rule 6A-1.012, Purchasing Policies, allow for alternative procurement practices when such practices will best serve the interests of the District. Board Policy 7.14 and the Administrative Purchasing and Contractual Procedure Manual authorizes the District to purchase goods and services in manners prescribed by SBE Rule 6A-1.012.

Some of the provisions under SBE Rule 6A-1.012 actually allow the District to directly negotiate with a particular vendor without soliciting quotes from other vendors. Other situations allow for the direct purchase of educational services from another governmental agency without solicitation of quotes/bids or from publishers or software companies that publish or produce the desired textbook, library book, software, etc. Further, direct purchases of health services are exempt in addition to lectures by individuals which could be construed as a consultant hired for staff development.

Other options under SBE Rule 6A-1.012 include the use of other contracts/bids secured by other governmental entities and state purchasing contracts obtained by the Department of Management Services. These options are the result of formal competitive solicitations and proposals.

Economy and Efficiency Requirement

Section 200.318 subsections (d) through (e) of the Uniform Grants Guidance discusses matters which the District should consider when contemplating any purchase with Federal funds. One of emphasis is the encouragement of entering into inter-local agreements with other governmental entities where appropriate for the procurement of goods and services. Such regulation is considered to be consistent with the provisions of SBE Rule 6A-1.012 with regards to utilizing contracts competitively procured by other governmental agencies and the use of other governmental agencies directly for goods or services. This coordination of statutory language shall be referenced when such contracts are utilized in lieu of the open competition approach required under Section 200.319 of the Uniform Grants Guidance.

UGG Competition Requirement

Section 200.319 of the Uniform Grants Guidance requires that all procurement transactions be conducted in a full and open competitive manner as described in the section. The section considers the absence of restrictive requirements as one step in satisfying the requirement. Such restrictive provisions to avoid are as follows:

1. Placing unreasonable requirements on firms in order for them to qualify to do business;
2. Requiring unnecessary experience and excessive bonding;
3. Noncompetitive pricing practices between firms or between affiliated companies;
4. Noncompetitive contracts to consultants that are on retainer contracts;
5. Organizational conflicts of interest;
6. Specifying only a "brand name" product instead of allowing "an equal" product to be offered and describing the performance or other relevant requirements of the procurement; and
7. Any arbitrary action in the procurement process.

Additionally, no prospective vendor is allowed to develop or draft any specifications, requirements, or procurement soliciting documents used in the procurement process and no geographical preferences are allowed in the procurement process.

Based on these provisions, some of the alternate approaches allowed under SBE Rule 6A-1.012 that in nature do not afford such open and full competition may require extensive documentation and ultimately approval from the Florida Department of Education. If solicitation efforts yield only one provider, then documentation of all solicitation must be attached to the Pre-Procurement Form. However, those alternate approaches within SBE Rule 6A-1.012 that allow use of other contracts competitively procured are allowed.

Federal Contractual Provisions Required

Appendix II of Part 200 of the Uniform Guidance requires that any contract exceeding \$10,000 must have a contract that includes a termination for cause and for convenience. The District's Administrative Purchasing and Contractual Procedure Manual includes the Contracted Services Agreement for Professional Services Form to be used for Federally funded contractual services. Additionally, for contracts equaling or exceeding \$25,000 the District must certify that the desired entity is NOT listed on the government wide exclusions in the Systems for Award Management (SAM). The requesting grant administrator shall obtain a printout of the search in the SAM and maintain the record for the required period.

These contractual requirements must be adhered to regardless of the desired procurement approach (economic and efficiency versus full and open competition).

FLOW OF PROCESSES PRIOR TO PROCUREMENT AND COMPLETING THE PRE-PROCUREMENT REVIEW FORM

Responsible Parties

Prior to finalizing and receiving approval for the procurement of goods/services with Federal funds, the grant administrator will ensure pre-procurement activities are conducted and documented in the following order:

- a. The proposed procurement is allowable.
- b. No conflict of interests exists.
- c. Opportunities for economic and efficient practices have been considered.
- d. Opportunities for competition have not been restricted.
- e. Justification for procurement approach.

When a best practice for procurement provides the opportunity, steps c. through e. may be accomplished and documented simultaneously by the District.

Allowable Cost

The first step of the pre-procurement process, the grant administrator shall document that the intended expenditure is allowable as described in the Determination of Allowability of Costs section of this manual. The Pre-Procurement Form includes a certification of completing this step. If an allowability issue arises requiring advice from the Florida Department of Education, documentation of such correspondence shall be attached to the form.

Contract Administration

The Contracted Services Agreement for Professional Services Form (see the Administrative Purchasing and Contractual Procedure Manual) is used to identify important aspects of a contract in writing that allows the grant administrator to maintain proper oversight of the performance of the contractor. NOTE: If the contractor has a prescribed contract that provides greater detail and is required by the contractor, then our Form will just reference the “attached” contract. Both documents will be signed by District and the contractor.

On the form the grant administrator shall ensure the following elements are defined:

- Description of the services or delivery of goods are clearly defined
- The period when services or good delivered will occur
- The location(s) of such services or delivery of goods
- Method of payment, i.e. rates of pay. Such rates can be based on an actual objective being achieved (i.e. a status report published and provided by contractor)

Notwithstanding the status of the contractor as a non-employee, the grant administrator may establish a sign-in sheet for a contractor at the applicable locations to document service provided to students or staff. A purchase order shall be issued to encumber the funds and the contract shall be attached to the purchase order in Skyward. Review of invoices by the grant administrator shall consider the terms within the contract. A schedule of submitting invoices may be agreed upon as well.

Cost Analysis

Section 200.322 of the Uniform Grants Guidance requires that whenever a purchase exceeds the Simplified Acquisition Threshold a cost analysis must be performed. The approach taken may include an independent estimation of the projected costs considered to be reasonable for the intended project. When such situations arise, the District shall follow the provisions prescribed within this section.

EQUIPMENT MANAGEMENT

Title and Use

Title to equipment purchased with Federal funds vests in the District upon acquisition. Such equipment must be used in the program or project for which it was acquired as long as needed and may not be encumbered without prior approval from the Federal awarding agency. When no longer needed for the original program or project, equipment may be used in activities under the original Federal awarding agency. If no longer needed under that agency, then the equipment may be used in activities under other Federal awarding agencies.

Any proceeds received from disposing of equipment may be used towards the purchase price of replacement equipment.

Management

A record of property purchased is maintained in Skyward along with essential data elements to include description of property, serial number, cost, funding source, etc. Property is marked with inventory tags and a physical inventory is conducted annually. Property custodians safeguard property and ensure property is maintained in good condition.

Disposition

When original or replacement equipment acquired under a Federal award is no longer needed for the original project or program or for other activities currently or previously supported by a Federal awarding agency, except as otherwise provided in Federal statutes, regulations, or Federal awarding agency disposition instructions, the non-Federal entity must request disposition instructions from the Federal awarding agency if required by the terms and conditions of the Federal award. Disposition of the equipment will be made as follows, in accordance with Federal awarding agency disposition instructions:

- Items of equipment with a current per unit fair market value of \$5,000 or less may be retained, sold or otherwise disposed of with no further obligation to the Federal awarding agency.
- Items of equipment with a current per-unit fair-market value in excess of \$5,000 may be retained by the non-Federal entity or sold. The Federal awarding agency is entitled to an amount calculated by multiplying the current market value or proceeds from sale by the Federal awarding agency's percentage of participation in the cost of the original purchase. If the equipment is sold, the Federal awarding agency may permit the non-Federal entity to deduct and retain from the Federal share \$500 or ten percent of the proceeds, whichever is less, for its selling and handling expenses.

TRAVEL COSTS

Travel costs are the expenses for transportation, lodging, subsistence, and related items incurred by employees who are in travel status on official business of the non-Federal entity. Such costs are charged on the mileage basis in lieu of actual costs incurred which is consistent with those normally allowed in like circumstances in the District's non-federally-funded activities and in accordance with the District's written travel reimbursement policies.

Costs incurred by employees and officers for travel, including costs of lodging, other subsistence, and incidental expenses, must be considered reasonable and otherwise allowable only to the extent such costs do not exceed charges normally allowed by the District in its regular operations as the result of the District's written travel policy. In addition, if these costs are charged directly to the Federal award documentation must justify that:

- Participation of the individual is necessary to the Federal award; and
- The costs are reasonable and consistent with non-Federal entity's established travel policy.

The District does not allow for temporary dependent care costs for any official travel.

TIME AND EFFORT

Costs of compensation are allowable to the extent that they are reasonable for the services rendered and conform to the established written policy of the District consistently applied to both Federal and non-Federal activities, follows an appointment made in accordance with all laws and/or rules or written policies and meets the requirements of Federal statute, where applicable, and is determined and supported as provided in paragraph (i) of Section 200.430, CFR, Standards for Documentation of Personnel Expenses, when applicable.

Documentation of Personnel Expenses

If an employee works solely on a single Federal award or cost objective, charges for the employee's salary and wages must be supported by semiannual certifications that the employee worked solely on that program or cost objective for the period covered by the certification.

In lieu of semiannual certifications, and in instances where an employee works on multiple activities or cost objectives, the following options are available for use:

Calendars or time and effort logs are maintained which adequately reflect an after-the-fact distribution of the actual activity of each employee and account for the total activity for which the employee is compensated. Calendars or time and effort logs are reviewed and signed monthly by grant administrators and maintained on file with each program department.