

GRANT FISCAL COMPLIANCE

Page 1 of 2

Grant funds received by the district shall be administered in accordance with this policy and applicable law, including but not limited to the federal Uniform Grant Guidance and state of Colorado requirements. The Board designates the Director of Federal Programs as the district contact for all federal programs and funding.

The superintendent or designee may develop and implement accompanying regulations to assist in the proper administration of grant funds and implementation of this policy, including but not limited to cash management procedures and allowability of costs.

Advanced Funding and Request for Funding

When grant funding is received by the district, the district will account for the receipt of these funds separately. The district will use separate general ledger accounts for the recordkeeping of these funds including segregation of funds by grant code and/or other general ledger account specification. The Division of Finance will assist with managing and reporting the funds including following all request for fund requirements and all periodic grant and final grant reporting requirements. A staff member from the Division of Finance will be assigned to work with the school and/or other staff member to ensure district procedures are followed and reporting requirements of the funding agency/organization are met. The funds will be tracked in the grants fund to ensure that the expenditures are appropriate and the funds are used only for the intended purpose meeting the applicable procurement and other grant requirements. If advanced funding is provided and there is remaining funds after the performance period, any unspent funds will be reallocated for the intended purpose of the grant as allowed or will be returned to the designator if appropriate.

Subrecipient monitoring

If the district awards subgrants, the district shall monitor grant subrecipients to ensure compliance with applicable law and Board policy.

Time and effort reporting

District employees paid with federal funds or other grant funds that requires time and effort reporting including state of Colorado requirements shall document the time they expend in work

GRANT FISCAL COMPLIANCE

Page 2 of 2

performed in support of each grant program and/or such program's cost objective(s), in accordance with applicable law. Time and effort reporting requirements do not apply to vendors.

Recordkeeping

The district shall maintain proper grant fiscal records in accordance with Board policy and applicable law. Such records shall be retrievable and available for programmatic or financial audit.

LEGAL REFS.: 2 C.F.R. Part 200 (*Uniform Grant Guidance*)
34 C.F.R. Parts 75, 76 (*EDGAR - Education Department General Administrative Regulations*)

CROSS REFS.: BCB, School Board Member Conflict of Interest
DJB, Purchasing Procedures
EHB, Records Retention
GBEA, Staff Ethics/Conflict of Interest

FEDERAL PROCUREMENT

Page 1 of 3

This policy and its accompanying regulation applies to the purchase of services, supplies, equipment, or other property with federal funds that are subject to the federal Uniform Grant Guidance (UGG) and other applicable federal law, including but not limited to the Education Department General Administration Regulations (EDGAR), and the United States Department of Agriculture (USDA) regulations governing school food service programs. In the event this policy or its accompanying regulation conflict or are otherwise inconsistent with mandatory provisions of the UGG, EDGAR, or other applicable federal law, the mandatory provisions of such laws control.

District employees must follow Board policy concerning employee purchasing authority when making any purchase with federal funds and must obtain prior Board approval in those instances when it is required by Board policy. District employees must also follow applicable state law and Board policy concerning competitive bidding, to the extent state law and/or Board policy establish additional requirements or procedures--including conducting criminal background checks for any person providing direct services to students pursuant to a written contract--that do not conflict with this policy and its accompanying regulation.

Federal micro-purchases (less than \$10,000)

A “micro-purchase” is a purchase of supplies or services using simplified acquisition procedures, the aggregate amount of which does not exceed the micro-purchase threshold.

Micro-purchases may be made or awarded without soliciting competitive quotations, to the extent district staff determine that the cost of the purchase is reasonable. For purposes of this policy, “reasonable” means the purchase is comparable to market prices for the geographic area.

To the extent practicable, the district will distribute micro-purchases equitably among qualified suppliers when the same or materially interchangeable products are identified and such suppliers offer effectively equivalent rates, prices, and other terms.

Federal simplified acquisition threshold (\$10,000 to under \$250,000)

“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

FEDERAL PROCUREMENT

Page 2 of 3

purchase procedures in order to expedite the purchase of items costing less than the simplified acquisition threshold.

For small purchases, price or rate quotes must be obtained in advance from a reasonable number of qualified sources, as detailed in this policy's accompanying regulation, unless:

1. a valid basis exists under the federal Uniform Grant Guidance for relying on procurement by a noncompetitive proposal (i.e., "single source" procurement); or
2. the district elects to use a more formal competitive bid or request for proposal process.

Competitive bidding threshold (\$250,000 or more)

The district must conduct a cost or price analysis for purchases that exceed the simplified acquisition threshold. At a minimum, this must include making an independent estimate before receiving bids or proposals (including noncompetitive proposals). A cost analysis means evaluating the separate cost elements that make up the price. A price analysis means evaluating the total price, without looking at the individual cost elements.

Whenever appropriate and relevant to the specific transaction, the cost analysis may include life-cycle cost estimates which must then be incorporated into any solicitations of bids or proposals.

Unnecessary or duplicative items

The district must avoid the acquisition of unnecessary or duplicative items.

Consideration must also be given to consolidating or breaking out purchases to obtain a more economical purchase.

Recordkeeping

The district must maintain records sufficient to detail the history of procurements made with federal funds. These records may include, but not necessarily be limited to, the following:

FEDERAL PROCUREMENT

Page 3 of 3

rationale for the method of procurement, contractor selection or rejection, and the basis for the contract price (including a cost or price analysis).

Retention of such procurement records must be in accordance with applicable law and Board policy.

LEGAL REFS.: 2 C.F.R. Part 200 Subpart D (*post-award requirements under the federal Uniform Grant Guidance*)
2 C.F.R. 200.318 (*general standards for procurement supported by federal funds*)
2 C.F.R. 200.319 (*written procurement standards required*)
2 C.F.R. 200.320 (*methods of procurement to be followed*)
2 C.F.R. 200.323 (*cost or price analysis*)
2 C.F.R. 200.333 (*record retention requirements*)
2 C.F.R. 200.336 (*access to records*)
7 C.F.R. 226 (*USDA procurement thresholds*)
7 C.F.R. 3016.36 (*USDA's procurement standards*)
7 C.F.R. 3016.37 (*USDA's procurement requirements for subgrants*)
34 C.F.R. Parts 75, 76 (*EDGAR - Education Department General Administrative Regulations*)
48 C.F.R. Subpart 2.1 (*micro-purchase and competitive bidding thresholds*)
C.R.S. 22-32-144 (4) (*background check provision required in service contracts*)

CROSS REFS.: BCB, Board Member Conflict of Interest
DJB, Purchasing Procedures
DKC, Expense Authorization/Reimbursement
EHB, Aurora Public Schools Records Retention and Destruction
GBEA, Staff Ethics/Conflict of Interest