

Grant Folder(s) Checklist

Part I – Initial Contents

- Submitted Grant Proposal
- Official Grant Award Letter from Granting Agency
- Grant Number Assignment Memo (issued from Budget Department)
- Approved Official Line Item Budget in acceptable budget format

Part II – Grant Period / Management Contents

- Correspondence
 - Internal organization correspondence re: grant project
 - In-Kind letters confirming donation value and timing
 - Granting agency correspondence
- Account Maintenance Requests (if any)
- Approved Budget Revisions (if any)
 - Approval letter from Granting Agency authorizing major budget revisions attached to revision spreadsheet
- Monthly Detail & Summary Reports
- Quarterly & semi-annual salary certifications for employees funded from federal awards
- Copies of ANY Reports Submitted to Granting Agency

Part III – Tracking Documentation (kept in grant filing cabinet or binder)

- Copies of all Personnel Activity Reports, Timecards, Stipend Payments
- Copies of all invoices & receipts
- Copies of all purchase orders
 - For purchases over \$10,000 a copy of the Board meeting agenda, and minutes on which item was approved attached to requisition copy
- Copies of all VISA forms & detailed receipts
- Copies of all Petty Cash forms
- Copies of all journal entries
- Copies of all professional or technical service contracts
 - Board meeting agenda and minutes on which contract was approved attached to contract
- Cash matching documentation – should be treated as if it were federal dollars with regards to the scrutiny of allowability and allocability, and documentation

Part VI – Grant Closing Contents

- Final Financial Status Report and/or Narrative Report
- Account Inactivation Check List
- Closing Letter to Granting Agency

Grant Folder(s) Checklist

- Copy of refund check requisition if applicable
- Copy of Board agenda and minutes on which refund was approved attached to requisition if refund is over \$10,000
- Closing Letter from Granting Agency confirming receipt of final report and any refunds, if applicable
- Copy of Audit(s) Grant Funding Appeared On

Post Award Management – What is it really?

- **Good post-award management can be summed up as a genuine understanding of and a commitment to the implementation of all regulations and rigorous internal control procedures to which all grant activities and transactions must adhere.**
 - ***Where do you start?***
 - Start with the Award Letter and attachments (see hand outs). Understanding what each of its component parts means is important. Page 3 details what the information in each of the award letter's boxes means.
 - Find all the regulations that were referenced in the award letter, print a copy to keep on file, and read them thoroughly with a highlighter, sticky notes, and/or a pencil for writing in the margins.
 - Gather all key personnel and address which person or department will be responsible for tracking, monitoring, reporting, etc with regards to the grant. Be sure to include representatives from Human Resources, Payroll, Accounting/Budgeting, and Purchasing (especially if you are planning on large purchases requiring bids). Everyone should be clear on their responsibilities.
 - Always keep in mind that the grant was given to your organization – not you as an individual. This is a group effort, and rarely can one single person do everything. Your support system of interdepartmental relationships will come into play more so with grants than with normal organizational non-grant funds due to all of the 'strings' attached to the money.
 - ***Catalog of Federal Domestic Assistance (CFDA) numbers and their associated regulations can be found online at:***
 - <http://12.46.245.173/cfda/cfda.html>
 - Be sure to use the link "Search for Assistance Programs (HTML)",
 - Next, use the link "Search By Program Number",
 - Enter the Program Number in the box and click the button View Program

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- Important information on the CFDA program details page:
 - Authorizing legislation
 - Objectives of the funding
 - Uses and Restrictions
 - Here is where the standards for the use of funds are located, such as non-supplanting requirements, restricted indirect cost rate requirements, and so on.
 - Applicant and Beneficiary Eligibility – we know you as the applicant were eligible otherwise you wouldn't have received the grant – but who can you provide services to with the grant dollars? This is where you will find that information.
 - Deadlines
 - Formula and Matching Requirements – many grants have them
 - Length and Time Phasing of Assistance
 - Reports
 - Audits
 - As stated on the CFDA information under Audits, *“...State and local governments that receive financial assistance of \$500,000 or more within the State's fiscal year shall have an audit made for that year.”*
 - The audit referred to is an OMB Circular A-133 Audits of States, Local Governments, and Non-Profit Organizations
 - These guidelines and supplements also dictate the management of your grant
 - OMB Circular A-133 can be found at:
 - <http://www.whitehouse.gov/omb/circulars/a133/print/a133.html>
 - You will also need the A-133 Compliance Supplement which is found at:
 - <http://www.whitehouse.gov/omb/circulars/a133/compliance/08/08toc.html>
 - Be sure to get the Part for the Department that issued your funding AND
 - Make sure to get Part 6 Internal Controls
 - Not all of the fourteen “generic” compliance areas will be applicable to your grant
 - Records – how long must you maintain all documentation varies from grant to grant and department of the government

REMEMBER:

Auditors do not merely test the financial records. Thorough auditors will test for regulatory compliance and adherence to stated timelines, and other measurable objectives. Yet, while a federal program may have many compliance requirements, normally there are only a few key compliance requirements that could have a direct and material effect on a program.

SUGGESTION:

Attend a training intended for auditors on OMB A-133 and its Compliance Supplement taking with you those persons in your organization who are responsible for audits.

Post Award Management – What is it really?

- Regulations, Guidelines, and Literature –
 - All grants must adhere to 2 CFR
 - This area will also include program specific regulations or exceptions
- **Code of Federal Regulations (CFR)**
 - Each department of the government has its own specific CFR
 - All grants are covered by at least two CFRs
 - Federal Departments can provide copies of their CFRs if you ask for them
 - CFRs can be found online at:
 - <http://www.access.gpo.gov/nara/cfr/cfr-table-search.html>
 - Use the CFR published the year your grant was awarded for starters, and if your grant runs multiple years, check the subsequent publications for updates
- **2 CFR Grants & Agreements**
 - 2 CFR § 215 Uniform Administrative Requirements for Grants and Agreements with Institutions of Higher Education, Hospitals, and Other Non-Profit Organizations (formerly OMB Circular A-110) –
 - Subpart C – Post-Award Requirements §215.20 through 215.62
 - Subpart D – After-The-Award Requirements § 215.70 through 215.73
 - 2 CFR § 220 Cost Principles For Education Institutions (formerly OMB Circular A-21)
 - 2 CFR § 225 Cost Principles for State, Local, and Indian Tribal Governments (formerly OMB Circular A-87)
 - 2 CFR § 230 Cost Principles for Non-Profit Organizations (formerly OMB Circular A-122)
- **Department Specific CFR for example:**
 - Department of Ed – 34 CFR also known as EDGAR
Education Department General Administrative Regulations
 - Department of Agriculture – 7 CFR

REMEMBER:

Develop a good working relationship with the funding agency contact personnel by keeping them updated & turning in reports on time.

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- Department of Housing & Urban Development – 24 CFR
- Department of Transportation – 49 CFR
- Bureau of Indian Affairs – 25 CFR

- **Should you have a pass through agency, such as Kansas Department of Education, or KDOT, ask them if they have agency or program specific regulations that need to be adhered to as well.**
 - Be sure to obtain copies of the regulations that the State has placed upon the funding that is passing through their administration.
 - For school districts, use the Kansas Accounting Handbook for Unified School Districts available on the KSDE website

- **Be aware that each set of regulations needs to be adhered to. Determine which regulations are the most restrictive and adhere to those.**
 - Example: Equipment
 - Federal government regulations define *equipment* “*tangible, nonexpendable, personal property having a useful life of more than one year and an acquisition cost of \$5,000 or more per unit. A grantee may use its own definition of equipment provided that such definition would at least include all equipment defined above*”
 - Wichita Public Schools Board of Education Policy P3215 Fixed Asset Accounting System gives a more restrictive definition; “*Equipment, furniture, vehicles, and machinery*” include items that are constructed from various materials to perform specific useful functions. Such items have suitable size, shape, and usage to make individual identification feasible...” and also meets the criteria:
 1. *Is tangible in nature.*
 2. *Has an extended useful life of a minimum of two years.*
 3. *Is not a repair part or consumable item.*
 4. *Has a purchase price of \$2000 or more.*
 - Kansas Accounting Handbook for Unified School Districts from KSDE has a Supply and Equipment section that gives the following definition “*Criteria for Equipment Needs: 1) It retains its original shape and appearance with use. 2) It is non-expendable, that is, if the article is damaged or some of its parts are lost or worn out, it is usually more feasible to repair it rather than replace it with an entirely new unit. 3) It represents an investment of money which makes it feasible and advisable to capitalize the item. 4) It does not lose its identify*”

REMEMBER:

There is a hierarchy of legal authority:

1. Statute
2. Regulations
3. Guidance in the Federal Register
4. Guidance on the Web
5. State Plans/Guides
6. Emails from Program Personnel
7. Telephone Calls

Post Award Management – What is it really?

through incorporation into a different or more complex unit or substance.”

- Additionally, the Accounting Handbook contains a 13 page list of items classified as either supplies or equipment
- ***Now that you have all the regulations and have read them thoroughly, re-read your approved grant application, making notes on items that can be tested for compliance per the audit supplement, and that need to be monitored either financially, or programmatically.***

- ***Compiling Lists***

- See handout called – Grant Folder(s) Checklist
- Rules, regulations, policies and statutes that apply to management – including your own organizations policies.
 - These should be easily assessable to all staff involved with award management
- Due dates, forms, and types of reporting required for submission.
- Key dates that correspond with stated milestones or objectives Timelines are critical. Stick to them as closely as possible. If deviation occurs, contact the granting agency for approval in delaying the objective.

- ***Training Personnel***

- It is the responsibility of the management of the funded organization to ensure that all staff coming into contact with or responsible for activities related to the award receive training in the various rules, regulations, et al, that govern the award.
- Ignorance of the regulations is not an exception from an audit finding

SUGGESTION

Funding agencies often host *free* training workshops make the most of them by attending.

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- **Management is a continuing process filled with decision making and activities undertaken to achieve grant goals**

- **Questions to ask while making decisions on funding expenditures or activities:**

- Is the proposed cost or activity consistent with the federal cost principles?
- Is the proposed cost allowable under the relevant program?
 - Did you include it in the grant application? If not, don't do it or buy it without contacting the funding agency program personnel to ask permission to deviate from approved activities or expenditures. Get their approval in writing and keep in on file attached to both the grant application and the expenditure source documentation.
 - Do not assume you can do it and ask for approval later. Item or activity costs could then be considered unallowable and your organization could be held responsible for the expense and must reimburse the funding agency.
 - There are few exceptions. One such example can be found at 34 CFR §81.33 Mitigating circumstances.
 - "(a) A recipient that is a State or local education agency and that has made an unallowable expenditure or otherwise failed to account properly for funds is not required to return any amount that is attributable to the mitigating circumstances described in paragraph (b), (c), or (d) of this section."
 - "(b) Mitigating circumstances exist if it would be unjust to compel the recover of funds because the recipient's violation was caused by erroneous written guidance from the department..."
 - "(2) The guidance was provided by a Departmental official authorized to provide the guidance, as described by that notice;"
 - "(3)The recipient actually relied on the guidance as the basis for the conduct that constituted the violation; and"
 - "(4) The recipient's reliance on the guidance was reasonable."
- Is the proposed cost consistent with program specific fiscal rules?
- Is the proposed cost consistent with applicable Code of Federal regulations?

REMEMBER:

Some items or activities need to go out to bid, be approved by the organizations governing body, be discussed at a public/community hearings, or must be published in the newspaper for a certain number of days.

Always allow yourself enough time for the publication, meeting, and bidding process.

For meetings, be sure to have a copy of the minutes that shows approval of your activity or purchase.

For public hearings be sure to have a copy of the minutes from the meeting along with a copy of the sign in sheet from all attendees.

For items requiring newspaper publishing, request a "tear sheet" with the newspaper's billing invoice.

Post Award Management – What is it really?

- ***Issues that complicate award management***

- ***Change in key personnel***

- Must notify the granting agency
- Need to hire new personnel and sometimes it can be at a different pay rate than the previous person
 - Be sure to coordinate with Human Resources regarding the allowable budgeted wage for personnel being paid for by the grant.
 - Do you have a grant employee policy? All grant employees should know that their continued employment is dependent upon continued funding of the project they are employed to work on. If funding goes away, so does their job.
 - This is a key point to keep in mind – Funding agencies typically continue to fund a project if the project is showing measurable growth and progress towards achieving the goals of the grant and there is funding to do so.
- May need to seek budget adjustments from the granting agency to either cover the overage on the new personnel or shift realized budget surplus into other allowable cost objectives
- New staff might not know the roles and responsibilities or policies, regulations, and procedures

REMEMBER:

Developing a close working relationship with the personnel of Human Resources and the Fiscal department is an important factor in post-award management success. Many compliance issues rely heavily upon the knowledge and practices of Financial Services personnel.

- ***Change in financial system software***

- Get involved with the selection process if your Financial Services Division allows it
- Strongly advocate for a financial system that can adequately handle the rigorous tracking requirements of federal awards
 - As an example: 34 CFR §80.20 provides standards for financial management systems
 - Meet with your Controller or Budget Director to verify that all of the conditions of the regulation can be met by the financial system

- ***Destruction or loss of documentation***

- Try to have back-up – duplicates on a different server
- Scan paper documents to keep them electronically

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○ **Cash Flow**

- Federal cash on hand for more than three days violates the “3-day rule”. You must time your requests for federal disbursements so that your organization does not have unobligated federal cash on hand for more than three consecutive days.
- To make sure you don’t violate this, stay in reimbursable status if your organization can bear the financial burden
- Advance payments cause issues especially if on hand more than three days and the organization earns interest on the unobligated federal funds they have in their bank account.
 - As an example: 34 CFR §80.21(i) *Interest earned on advances*. “...grantees and subgrantees shall promptly, but at least quarterly, remit interest earned on advances to the federal agency. The grantee or subgrantee may keep interest amounts up to \$100 per year for administrative expenses.

○ **Closing The Period of Availability of Funds on Time**

- As an example: 34 CFR §80.23(b) A grantee must liquidate all obligations incurred under the award not later than 90 days after the end of the funding period (or as specified in a program regulation)
- If you can’t get this done, ask for a one time extension of the grant. Many agencies allow this extending the grant period for up to twelve months.

○ **Time Distribution Records**

- Split funded employees
 - 2 CFR 225 Appendix B Compensation for Personnel Services
 - If federal funds are used for salaries then “time distribution records” are required.
 - Must demonstrate that the employee worked on allowable “cost objectives”
 - May use percentage of time for budgeting purposes but there must be an after the fact reconciliation of actual time
 - Monthly, quarterly, and semi-annual reports and certifications are required

SUGGESTION:

Avoid split funding an employee if it is at all possible.

Post Award Management – What is it really?

○ **Misunderstood Concepts**

- Direct costs vs. Indirect cost (excerpt from A-87)
 - **Indirect Costs** - General. **Indirect costs are those: (a) incurred for a common or joint purpose benefiting more than one cost objective, and (b) not readily assignable to the cost objectives specifically benefitted, without effort disproportionate to the results achieved. The term "indirect costs," as used herein, applies to costs of this type originating in the grantee department, as well as those incurred by other departments in supplying goods, services, and facilities.** To facilitate equitable distribution of indirect expenses to the cost objectives served, it may be necessary to establish a number of pools of indirect costs within a governmental unit department or in other agencies providing services to a governmental unit department. Indirect cost pools should be distributed to benefitted cost objectives on bases that will produce an equitable result in consideration of relative benefits derived.
 - 2. Cost allocation plans and indirect cost proposals. Requirements for development and submission of cost allocation plans and indirect cost rate proposals are contained in Attachments C, D, and E of OMB Circular A-87
 - 3. Limitation on indirect or administrative costs.
 - In addition to restrictions contained in this Circular (OMB Circular A-87), there may be laws that further limit the amount of administrative or indirect cost allowed.
 - Amounts not recoverable as indirect costs or administrative costs under one Federal award may not be shifted to another Federal award, unless specifically authorized by Federal legislation or regulation.
- Program Income
 - Program income means gross income received by the grantee or subgrantee directly generated by a grant supported activity, or earned only as a result of the grant agreement during the grant period.
 - Program income includes (but is not limited to) fees for services performed; from the use or rental of real or personal property acquired with grant funds; from the sale of commodities or items fabricated under a grant agreement; and from payments of principal and interest on loans made with grant funds.
 - Program income must be tracked and expended as if it were federal grant dollars because in essence, it is

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- Additionally, costs financed by program income are ineligible towards satisfying a cost sharing or matching requirement unless they are expressly permitted in the terms of the assistance agreement

○ **General Organizational Deficiencies**

- Inadequate resources
- Roles and responsibilities of staff not clearly defined leading to inadequate separation of duties
- Outdated or nonexistent policies or procedures
- Inadequate staff training and education
- Inadequate management systems
- Organizational or individual perception that internal control systems are not really necessary

• **How to prepare for reporting and compliance**

○ **Balancing your financial reports monthly**

- Use tracking spreadsheets of your own to keep track of all your expenditures as they move from projected expenditures, to true obligations, to actual expenditures.
- Balance your tracking spreadsheet with the detail general ledger reports provided by your financial services department
- Identify errors as soon as possible and correct errors through financial services using journal entries or budget adjustments. Always be sure to document the error and how you found it and fixed it – and WHY you did this. Example:
 - A computer was purchased to service both grant objectives and non-grant objectives but was charged solely to the grant when the cost should have been split between the grant and the organization's general fund. The grant must be reimbursed the portion of the cost that should have been charged to the general fund.
- Make sure that an after the fact reconciliation of time spent on the grant by grant funded employees is done and certified appropriately

REMEMBER:

Costs must be:

- Necessary & reasonable
- Allowable & allocable

Total federal costs must be:

- In accordance with GAAP
- Not included as match
- Net of applicable credits

○ **Keep a journal**

- For the non-financial portion of your reports, keep a journal
 - Use a five part ring binder with pockets or a folder with sections and paper you can scribble notes on while in

Post Award Management – What is it really?

- meetings on the grant, while performing monitoring visits, or while attending grant activities
- It is sometimes not possible to bring a laptop with you to take notes so do it the “old fashioned” way
- When you have time, transfer the notes to electronic format onto a working or draft version of your report.
- Do not wait until your report is due to try and accumulate information for your report.
 - By working on your journal, you will find it easier to answer the questions of your reports
 - Using the sections within a five part binder or folder you can segregate your notes by topic or question in the report you will eventually turn in
- ***If you can afford it, or have written it into the grant costs, hire an external evaluator to perform assessments on your program’s progress***
- ***Have a copy of the report that you will eventually be required to submit***
 - Update the report monthly with information
 - Include with the report a “how to” step by step guide on where you got all of the information from, for example:
 - Actual expenditures in Column G are taken from the latest month’s Report of Balances YTD Expenditure column
 - Include copies of all the source documentation (reports) that you used to compile the grant report highlighting or circling the numbers that you are pulling off the report
- ***Prepare yourself so you can answer questions from auditors. It is your responsibility to know what they are required to ask of you, what you are required to answer, and what they are required to do.***
 - Your organization is required to hire an auditor to perform a single audit if you meet the audit threshold
 - Audit threshold – Expenditure of \$500,000 or more annual
 - Based on when the activity related to the award occurs.
 - Examples:
 - Expenditures/Expenses
 - Use of loan proceeds

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- Receipt of surplus property
- Distribution or consumption or commodities
- Major program determination is a risk-based approach
 - Includes consideration of:
 - Current and prior audit experience
 - Oversight by Federal agencies and pass through entities
 - Inherent risk
 - At least 50% of total federal expenditures must be audited as major programs
 - However, the minimum for “low-risk auditees” is 25%
 - Major programs are all Type A program except those identified as low risk, plus at least one-half of the high risk Type B programs, not to exceed the number of low risk Type A programs.
 - Type A programs generally have expenditures exceeding the greater of 3% of total federal expenditures for the organization or \$500,000
 - A low-risk Type A program:
 - Audited as a major program in at least one of the last two years
 - No findings in the most recent audit period
 - Type B programs are all non-Type A’s
 - A high-risk Type B program:
 - Based on the professional judgment of the auditor using the above mentioned considerations
 - Generally excludes programs with expenditures less than \$100,000
- Understand what an A-133 Single Audit entails, and learn what your part in it will require from you.
 - Auditee organizations are required to prepare a Schedule of Expenditures of Federal Awards, also known as a SEFA. SEFA minimum requirements:

REMEMBER:

Auditors must determine what they are going to test. Here are the steps they use for identifying compliance requirements for testing:

1. Identify program objectives, procedures, and compliance requirements
2. Identify which of the compliance requirements could have a direct and material effect on the program
3. Identify which compliance requirements are susceptible to testing
4. Identify into which of the 14 types of compliance requirements each compliance requirement falls
5. Identify special tests and provisions that apply

See handout called – Basic Information Form – Type B Audit

Post Award Management – What is it really?

REMEMBER:

Materiality is based on qualitative as well as quantitative aspects. Possible direct and material effect characteristics include:

- Noncompliance could likely result in a **material** questioned cost
- The requirement affects a large part of the federal program
- Noncompliance could cause the federal agency or pass-through entity to take action such as seeking reimbursement or suspension

The auditor is only expected to test compliance for those requirements which are susceptible to testing by the auditor. They should be practical, objective, able to be written down and value added.

- List individual federal programs by federal agency, also list federal programs within a cluster of programs
- For federal awards received as a sub-recipient:
 - Name of pass-through entity
 - Identifying number – pass through grantor number
- Federal awards expended and CFDA #
 - Expenditures ONLY do not include encumbrances/obligations
- Include notes to the schedule that describe the significant accounting policies used
- Pass-through entities should identify the total amount provided to sub-recipients from each federal program to the extent practical
- The audit “reporting package” must be completed and submitted along with the Data Collection Form to the Federal Clearinghouse by the earlier of:
 - Nine months after the end of the audit period
 - Thirty days after audit report issuance
- The Federal Clearinghouse will distribute a copy of the reporting package, but not the Data Collection Form, to each federal agency **directly affected by a finding**
- Additionally, recipients must submit the reporting package to each pass-through entity affected by a finding OR notify them in writing that an audit was conducted with no applicable finding
- A “reporting package” must include:
 - Financial statements and schedule of expenditures of federal awards
 - Summary of prior audit findings
 - Auditor’s reports
 - Corrective Action Plan

• **Recap –**

- ***Compliance is the effective management of public funds to maximize outcomes***
- ***Good management and adherence to regulations is critical to avoid fraud, and institutional mismanagement***

Basic Information

Name of Grant: _____

CFDA# _____

Contact Person:

Name: _____

Title: _____

Phone: _____

Address: _____

Fax: _____

Nature of Grant (use estimates):

Total federal expenditures on an annual basis \$ _____

Percent of grant spent at your level on staff payroll cost _____%

Percent of grant spent at your level on other administration _____%

Percent of grant spent at your level on program/recipients _____%

Percent of grant passed through to subrecipients _____%

Types of Services Allowed

1. In the space below, document the specific types of expenditures allowed for the federal program.

Control Procedures

	Yes	No	N/A	Person Responsible
1. Does the entity have written policies and procedures on making grant applications and accepting grant awards?	___	___	___	_____
2. Is one person responsible for reviewing grant expenditures for compliance with the terms and conditions of the grant to insure that expenditures are for allowable goods and/or services?	___	___	___	_____
3. Does a designated employee review and authorize all grant expenditures for the program?	___	___	___	_____
4. Describe methods used to ensure program administrators are provided with adequate, training for allowable/unallowable cost determination:				

Eligibility

1. In the space below, document the eligibility requirements for the federal program.

Control Procedures

	Yes	No	N/A	Person Responsible
1. Are written policies and procedures as to how to determine eligibility maintained?	___	___	___	_____

2. Describe methods used to ensure program administrators are provided with adequate, training for eligibility determination:

3. Is there a review of case files by an independent person trained in the program's requirements before benefits are granted?

4. Is there periodic review of case files to determine continuing eligibility?

5. Describe any other type of reviews performed to determine appropriateness of eligibility determinations such as a formal sampling plan or supervisory random reviews.

Matching, Level of Effort

1. In the space below, document the matching and/or level of effort requirements for the federal program.

Control Procedures

Yes No N/A Person Responsible

1. Are written policies and procedures maintained on matching, level of effort and earmarking requirements?

2. Are written policies and procedures maintained to determine that the amounts claimed or used for matching are determined in accordance with OMB Circular A-87 and A-102? _____
3. Are program administrators provided with adequate and timely training regarding procedures for this area? _____

Reporting

1. In the space below, document the federal reports required for this program:

<u>Report #</u>	<u>Period Covered</u>	<u>Due Date</u>	<u>Person Responsible</u>
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2. Identify by the report number above the type of report (i.e. whether it covers financial data, program/performance data or both) and what computer system(s) are used to accumulate the information to prepare the reports:

<u>Report #</u>	<u>Type of Report</u>	<u>Computer System(s)</u>
-----------------	-----------------------	---------------------------

Control Procedures

- | | Yes | No | N/A |
|---|-------|-------|-------|
| 1. Are written policies and procedures maintained indicating the time and manner in which reports are to be completed and are these instructions consulted whenever a report is prepared? | _____ | _____ | _____ |
| 2. Do "tickler files" exist listing the due dates for reports? | _____ | _____ | _____ |
| 3. Are copies of filed reports, including documentation of how the information on them was obtained kept on file? | _____ | _____ | _____ |
| 4. Are postal receipts indicating timely filings maintained? | _____ | _____ | _____ |
| 5. Are reports reconciled to the General Ledger supporting the amounts claimed for reimbursement or advances? | _____ | _____ | _____ |
| 6. Describe experience and training of personnel responsible for preparing reports: | | | |

7. Describe supervisory review process of report preparation:

Subrecipient Monitoring

1. If applicable, describe procedures used to monitor program funds passed through to subrecipients.

Federal Agency Oversight

1. List all program monitoring or audits that have occurred from Federal agencies or pass-through entities during the past year and the related findings.

Inherent Risk Assessment

1. Listed below are several factors that significantly influence the inherent risk of noncompliance with applicable laws and regulations of federal programs. Place a check in the box beside the factors that are applicable to this program:

Factors to be Considered	Significant Factor Y/N	Comments
a. Value Range of Transactions - The wider the value range of transactions, the higher the risk.		
b. Life Cycle of Program at Federal Level - New programs or programs with recent changes in program compliance requirements have higher risk.		
c. Life Cycle of Program at Auditee Level - i. The newer the program to the organization, the higher the risk.		
ii. Programs closing during the year indicate higher risk.		
d. Utilization of Subrecipients - The more the program's activities are carried out through subrecipients, the higher the risk.		
e. Utilization of Contracts for Goods and Services - The more the use of contracts for goods and services, the higher the risk.		

3. List any changes to computer systems used to administer the program during the year.

4. If the grant is primarily used for staff and payroll costs, describe the procedures used for time and effort reporting.



U.S. Department of Education
Washington, D.C. 20202

GRANT AWARD NOTIFICATION

1 RECIPIENT NAME: Wichita Public School USD #259 201 North Water Street Wichita, KS 67202	5 AWARD INFORMATION PR/AWARD NUMBER Q215F040291 ACTION NUMBER 01 ACTION TYPE New AWARD TYPE Discretionary																				
2 PROJECT TITLE <u>84.215F</u> CAROL M. WHITE PHYSICAL EDUCATION PROGRAM	6 AWARD PERIODS: <u>BUDGET PERIOD 10/01/2004 - 09/30/2005</u> PERFORMANCE PERIOD 10/01/2004 - 09/30/2007 FUTURE BUDGET PERIODS <table border="1" style="width:100%; border-collapse: collapse; margin-top: 5px;"> <thead> <tr> <th>BUDGET PERIOD</th> <th>DATE</th> <th>AMOUNT</th> </tr> </thead> <tbody> <tr> <td>02</td> <td>10/01/2005 - 09/30/2006</td> <td>\$481,721.00</td> </tr> <tr> <td>03</td> <td>10/01/2006 - 09/30/2007</td> <td>\$359,784.00</td> </tr> </tbody> </table>	BUDGET PERIOD	DATE	AMOUNT	02	10/01/2005 - 09/30/2006	\$481,721.00	03	10/01/2006 - 09/30/2007	\$359,784.00											
BUDGET PERIOD	DATE	AMOUNT																			
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3 PROJECT STAFF RECIPIENT PROJECT DIRECTOR Rhonda Holt (316) 973 - 4407 EDUCATION PROGRAM CONTACT Dana S. Carr (202) 260 - 0823 EDUCATION PAYMENT CONTACT GAPS PAYEE HOTLINE (888) 336 - 8930	7 AUTHORIZED FUNDING THIS ACTION \$497,994.00 BUDGET PERIOD \$497,994.00 PERFORMANCE PERIOD \$497,994.00 RECIPIENT COST-SHARE 11.28% <u>RECIPIENT NON-FEDERAL AMOUNT \$56,154.00</u>																				
4 KEY PERSONNEL <table border="1" style="width:100%; border-collapse: collapse; margin-top: 5px;"> <thead> <tr> <th>NAME</th> <th>TITLE</th> <th>LEVEL OF EFFORT</th> </tr> </thead> <tbody> <tr> <td>Rhonda Holt</td> <td>Project Director</td> <td>10%</td> </tr> </tbody> </table>	NAME	TITLE	LEVEL OF EFFORT	Rhonda Holt	Project Director	10%	8 ADMINISTRATIVE INFORMATION DUNS/SSN 043063221 <u>REGULATIONS EDGAR AS APPLICABLE</u> <u>ATTACHMENTS A, B OSDFS, C, F, S</u>														
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9 LEGISLATIVE AND FISCAL DATA AUTHORITY: PL 107-110 SAFE & DRUG-FREE SCHOOLS & COMMUNITIES ACT OF ESEA, AS AMENDED BY NCLB PROGRAM TITLE: FUND FOR THE IMPROVEMENT OF EDUCATION CFDA/SUBPROGRAM NO: 84.215F <table border="1" style="width:100%; border-collapse: collapse; margin-top: 5px;"> <thead> <tr> <th>FUND CODE</th> <th>FUNDING YEAR</th> <th>AWARD YEAR</th> <th>ORG. CODE</th> <th>CATEGORY</th> <th>LIMITATION</th> <th>ACTIVITY</th> <th>CFDA</th> <th>OBJECT CLASS</th> <th>AMOUNT</th> </tr> </thead> <tbody> <tr> <td>0203A</td> <td>2004</td> <td>2004</td> <td>EQ000000</td> <td>B</td> <td>GBF</td> <td>000</td> <td>215</td> <td>4101C</td> <td>\$497,994.00</td> </tr> </tbody> </table>		FUND CODE	FUNDING YEAR	AWARD YEAR	ORG. CODE	CATEGORY	LIMITATION	ACTIVITY	CFDA	OBJECT CLASS	AMOUNT	0203A	2004	2004	EQ000000	B	GBF	000	215	4101C	\$497,994.00
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U.S. Department of Education
Washington, D.C. 20202



GRANT AWARD NOTIFICATION

PR/AWARD NUMBER: Q215F040291

RECIPIENT NAME: Wichita Public School USD #259

10

TERMS AND CONDITIONS

- (1) THE FOLLOWING ITEMS ARE INCORPORATED IN THE GRANT AGREEMENT: (1) THE RECIPIENT'S APPLICATION (BLOCK 2), (2) THE APPLICABLE EDUCATION DEPARTMENT REGULATIONS (BLOCK 8), AND (3) THE SPECIAL TERMS AND CONDITIONS SHOWN AS ATTACHMENTS (BLOCK 8).

THIS AWARD SUPPORTS ONLY THE BUDGET PERIOD SHOWN IN BLOCK 6. IN ACCORDANCE WITH 34 CFR 75.253, THE DEPARTMENT OF EDUCATION WILL CONSIDER CONTINUED FUNDING IF: (1) CONGRESS HAS APPROPRIATED SUFFICIENT FUNDS UNDER THE PROGRAM, (2) THE DEPARTMENT DETERMINES THAT CONTINUING THE PROJECT WOULD BE IN THE BEST INTEREST OF THE GOVERNMENT, (3) THE RECIPIENT HAS MADE SUBSTANTIAL PROGRESS TOWARD MEETING THE OBJECTIVES IN ITS APPROVED APPLICATION, AND (4) THE RECIPIENT HAS SUBMITTED REPORTS OF PROJECT PERFORMANCE AND BUDGET EXPENDITURES THAT MEET THE REPORTING REQUIREMENTS FOUND AT 34 CFR 75.118 AND ANY OTHER REPORTING REQUIREMENTS ESTABLISHED BY THE SECRETARY.

IN ACCORDANCE WITH 34 CFR 74.25(c)(2), OR 34 CFR 80.30(d)(3) CHANGES TO KEY PERSONNEL IDENTIFIED IN BLOCK 4 MUST RECEIVE PRIOR APPROVAL FROM THE DEPARTMENT.

THE SECRETARY ANTICIPATES FUTURE FUNDING FOR THIS AWARD ACCORDING TO THE SCHEDULE IDENTIFIED IN BLOCK 6. THESE FIGURES ARE ESTIMATES ONLY AND DO NOT BIND THE SECRETARY TO FUNDING THE AWARD FOR THESE PERIODS OR FOR THE SPECIFIC AMOUNTS SHOWN. THE RECIPIENT WILL BE NOTIFIED OF SPECIFIC FUTURE FUNDING ACTIONS THAT THE SECRETARY TAKES FOR THIS AWARD.

AUTHORIZING OFFICIAL

DATE

Charlotta A. Kilegovic 9-27-2004

EXPLANATION OF BLOCKS ON THE GRANT AWARD NOTIFICATION

For Discretionary, Formula, and Block Grants

(See Block 5 of the Notification)

1. **RECIPIENT NAME** - The legal name of the recipient, name of the primary organizational unit that will undertake the funded activity, and the complete address of the recipient. The recipient is commonly known as the "grantee."
2. **PROJECT TITLE AND CFDA NUMBER** - Identifies the Catalog of Federal Domestic Assistance (CFDA) subprogram title and the associated subprogram number.
3. **PROJECT STAFF** - This block contains the names and telephone numbers of the U.S. Department of Education and recipient staff who are responsible for project direction and oversight.
 - ***RECIPIENT PROJECT DIRECTOR** - The recipient staff person responsible for administering the project. This person represents the recipient to the U.S. Department of Education.
 - EDUCATION PROGRAM CONTACT** - The U.S. Department of Education staff person responsible for the programmatic, administrative and business-management concerns of the Department.
 - EDUCATION PAYMENT CONTACT** - The U.S. Department of Education staff person responsible for payments or questions concerning electronic drawdown and financial expenditure reporting.
4. * **KEY PERSONNEL** - Name, title and percentage (%) of effort the key personnel identified devotes to the project.
5. **AWARD INFORMATION** - Unique items of information that identify this notification.
 - PR/AWARD NUMBER** - A unique, identifying number assigned by the Department to each application. On funded applications, this is commonly known as the "grant number" or "document number."
 - ACTION NUMBER** - A numeral that represents the cumulative number of steps taken by the Department to date to establish or modify the award through fiscal or administrative means. Action number "01" will always be "NEW AWARD."
 - ACTION TYPE** - The nature of this notification (e.g., NEW AWARD, CONTINUATION, REVISION, ADMINISTRATIVE)
 - AWARD TYPE** - The particular assistance category in which funding for this award is provided, i.e., DISCRETIONARY, FORMULA, or BLOCK.
6. **AWARD PERIODS** - Project activities and funding are approved with respect to three different time periods, described below:
 - BUDGET PERIOD** - A specific interval of time for which Federal funds are being provided from a particular fiscal year to fund a recipient's approved activities and budget. The start and end dates of the budget period are shown.
 - PERFORMANCE PERIOD** - The complete length of time the recipient is proposed to be funded to complete approved activities. A performance period may contain one or more budget periods.
 - ***FUTURE BUDGET PERIODS** - The estimated remaining budget periods for multi-year projects and estimated funds the Department proposes it will award the recipient provided substantial progress is made by the recipient in completing approved activities, the Department determines that continuing the project would be in the best interest of the Government, Congress appropriates sufficient funds under the program, and the recipient has submitted a performance report that provides the most current performance information and the status of budget expenditures.
7. **AUTHORIZED FUNDING** - The dollar figures in this block refer to the Federal funds provided to a recipient during the award periods.
 - ***THIS ACTION** - The amount of funds obligated (added) or de-obligated (subtracted) by this notification.
 - ***BUDGET PERIOD** - The total amount of funds available for use by the grantee during the stated budget period to this date.
 - ***PERFORMANCE PERIOD** - The amount of funds obligated from the start date of the first budget period to this date.
 - RECIPIENT COST-SHARE** - The funds, expressed as a percentage, that the recipient is required to contribute to the project, as defined by the program legislation or regulations and/or terms and conditions of the award.
 - RECIPIENT NON-FEDERAL AMOUNT** - The amount of non-federal funds the recipient must contribute to the project as identified in the recipient's application. When non-federal funds are identified by the recipient where a cost share is not a legislation requirement, the recipient will be **required** to provide the non-federal funds.
8. **ADMINISTRATIVE INFORMATION** - This information is provided to assist the recipient in completing the approved activities and managing the project in accordance with U.S. Department of Education procedures and regulations.
 - DUNS/SSN** - A unique, identifying number assigned to each recipient for payment purposes. The number is based on either the recipient's assigned number from Dun and Bradstreet or the individual's social security number.
 - ***REGULATIONS** - The parts of the Education Department General Administrative Regulations (EDGAR) and specific program regulations that govern the award and administration of this grant.
 - ***ATTACHMENTS** - Additional sections of the Grant Award Notification that discuss payment and reporting requirements, explain Department procedures, and add special terms and conditions in addition to those established, and shown as clauses, in Block 10 of the award. Any attachments provided with a notification continue in effect through the project period until modified or rescinded by the Authorizing Official.
9. **LEGISLATIVE AND FISCAL DATA** - The name of the authorizing legislation for this grant, the CFDA title of the program through which funding is provided, and U.S. Department of Education fiscal information.
 - FUND CODE, FUNDING YEAR, AWARD YEAR, ORG. CODE, PROJECT CODE, OBJECT CLASS** - The fiscal information recorded by the U.S. Department of Education's Grant Administration and Payment System to track obligations by award.
 - AMOUNT** - The amount of funds provided from a particular appropriation and project code. Some notifications authorize more than one amount from separate appropriations and/or project codes. The total of all amounts in this block equals the amount shown on the line, "THIS ACTION" (See "AUTHORIZED FUNDING" above (Block 7)).
10. **TERMS AND CONDITIONS OF AWARD** - Requirements of the award that are binding on the recipient.
 - ***AUTHORIZING OFFICIAL** - The U.S. Department of Education official authorized to award Federal funds to the recipient, establish or change the terms and conditions of the award, and authorize modifications to the award.

FOR FORMULA AND BLOCK GRANTS ONLY:

(See also Blocks 1, 2, 5, 6, 8, 9 and 10 above)

3. **EDUCATION STAFF** - The U.S. Department of Education staff persons to be contacted for programmatic and payment questions.
7. **AUTHORIZED FUNDING**
 - CURRENT AWARD AMOUNT** - The amount of funds that are obligated (added) or de-obligated (subtracted) by this action.
 - PREVIOUS CUMULATIVE AMOUNT** - The total amount of funds awarded under the grant before this action.
 - CUMULATIVE AMOUNT** - The total amount of funds awarded under the grant, this action included.

* This item differs or does not appear on formula and block grants.