



# LAKELAND SCHOOL SYSTEM

## POLICIES AND PROCEDURES

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Administration of Federal Education Programs

Aligned with the Requirements of the

New Uniform Grants Guidance

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## I. Introduction

This manual sets forth the policies and procedures used by Lakeland School System (LSS) to administer federal funds. The manual contains the internal controls and grant management standards used by LSS to ensure that all federal funds are lawfully expended. It describes in detail LSS's financial management system, including cash management procedures, procurement policies; inventory management protocols; procedures for determining the allowability of expenditures; time and effort reporting; record retention; and sub-recipient monitoring responsibilities.

New employees of LSS, as well as incumbent employees, are expected to review this manual to gain familiarity and understanding of LSS's rules and practices. If you have any questions regarding the administration of federal education grants, including questions related to specific federal grant programs, please do not hesitate to contact the applicable program office at the Tennessee Department of Education (TDOE).

## II. Financial Management System

The Lakeland School System (LSS) maintains a proper financial management system in order to receive both direct and state-administered grants and to expend funds associated with a grant award. Certain fiscal controls and procedures are in place to ensure that all financial management system requirements are met. Failure to meet a requirement may result in return of funds or termination of the award.

### A. Financial Management Standards

The standards for financial management systems are found at 2 C.F.R. § 200.302. The required standards include:

#### *Identification*

Lakeland School System will identify, in its accounts, all federal awards received and expended and the federal programs under which they were received. Federal program and award identification will include, as applicable, the CFDA title and number, federal award identification number and year, name of the federal agency, and, if applicable, name of the pass-through entity.

**Lakeland School System identifies each federal program by project code within a separate federal or state program fund. Fund 142 is for federal programs and 145 is for state programs.**

[www.comptroller.tn.gov/la/LGSlocalGovernment.asp](http://www.comptroller.tn.gov/la/LGSlocalGovernment.asp)

#### *Financial Reporting*

Accurate, current, and complete disclosure of the financial results of each federal award or programs will be made in accordance with the financial reporting requirements set forth in the Education Department General Administrative Regulations (EDGAR).

**All GAAP guidelines are followed. In addition to reporting in Eplan, the results are provided monthly to our school board and discussed with the school board at monthly meetings.**

#### Accounting Records

The Lakeland School System will maintain records, which adequately identify the source and application of funds provided for federally-assisted activities. These records will contain information pertaining to grant or subgrant awards, authorizations, obligations, unobligated balances, assets, expenditures, income and interest and be supported by source documentation.

Lakeland School System keeps separate records for each grant period. We keep electronic records in Eplan; and, ~~in Advanced Programs for Educational Computer Systems (APECS)~~ Skyward, as well as some paper back-up documentation.

### *Internal Controls*

Effective control and accountability will be maintained for all funds, real and personal property, and other assets. Lakeland School System will adequately safeguard all such property and will assure that it is used solely for authorized purposes.

“Internal controls” are tools to help program and financial managers achieve results and safeguard the integrity of their program. Internal controls should be designed to provide reasonable assurance that the following objectives are achieved:

- Effectiveness and efficiency of operations;
- Adequate safeguarding of property;
- Assurance property and money is spent in accordance with grant program and to further the selected objectives; and
- Compliance with applicable laws and regulations.

Lakeland School System (LSS) adheres to the internal controls inherent within the accounting procedures as established by the State of Tennessee for all school districts. LSS adheres to the Internal Control and Compliance Manual for Tennessee Municipalities. LSS follows GASB and FASB regulations relative to accounting processes and reporting. The Board supports the establishment and effectiveness of district internal controls as indicated in board policy 2.100 - through established efficient procedures for accounting, reporting, purchasing and delivery, payroll, payment of vendors and contactors, and all other areas of fiscal management.

[LSS Board Policy 2.100 \(Fiscal Management Goals\)](#)

### *Budget Control*

Actual expenditures or outlays are compared with budgeted amounts for each federal award.

Prior to entering a purchase order, Lakeland School System verifies adequate budget dollars in each federal award for each expenditure. The Superintendent approves purchase orders before ~~bookkeeper~~ Accountant processes checks. The School System Accountant provides the Superintendent and the Board with expenditure reports that detail percentage of the budget expended monthly. All expenditures are recorded in Eplan monthly for reimbursement.

### *Cash Management*

Lakeland School System will maintain written procedures to implement the cash management requirements found in EDGAR.



Lakeland School System's federal grants are reimbursable grants. Requisitions, followed by encumbering of dollars, followed by payment of the invoice must be done prior to requesting reimbursement for grant expenditures. No district fund may be in the negative. LSS continually monitors the activity within the Federal Projects fund to assure positive cash flow.

### *Allowable Costs*

Lakeland School system will maintain written procedures for determining allowability of costs in accordance with EDGAR.

All requisitions must be approved by the Superintendent or designee. Unallowable request for purchases are not approved.

### B. Overview of the Financial Management/Accounting System

Lakeland School System contracts with ~~Education Solutions Development Inc.~~ Skyward, to provide an accounting software that meets state and federal requirements. The software ~~is APECS, which includes~~ modules in asset management, payroll, purchasing, and general ledger.

Budgets are loaded into the above system as soon as final approval is received. The budget is compared to Eplan to ensure accurateness. The Chief Financial Officer (CFO) is responsible for preparing and analyzing the budget, which will be uploaded into ~~APECS~~ Skyward prior to July 1.

Accounts payables are entered by the Administrative Assistant to the Superintendent, through the accounting software. The Superintendent or designee approves all purchase orders in ~~APECS~~ Skyward prior to ~~the school bookkeeper uploading file to the financial institution for check processing-~~ his assistant placing the order. Once order is delivered and invoiced, the School System Accountant processes checks for payment. A file from the financial institution is imported into ~~APECS~~ Skyward for check reconciliation. Under 2 C.F.R. §200.302, a recipient must track the CFDA title and number, federal award identification number and year, name of the federal agency, and, if applicable, name of the pass-through entity. Lakeland School System meets these requirements by setting up project codes for each federal grant received. This prevents comingling of funds and provides more accountability.

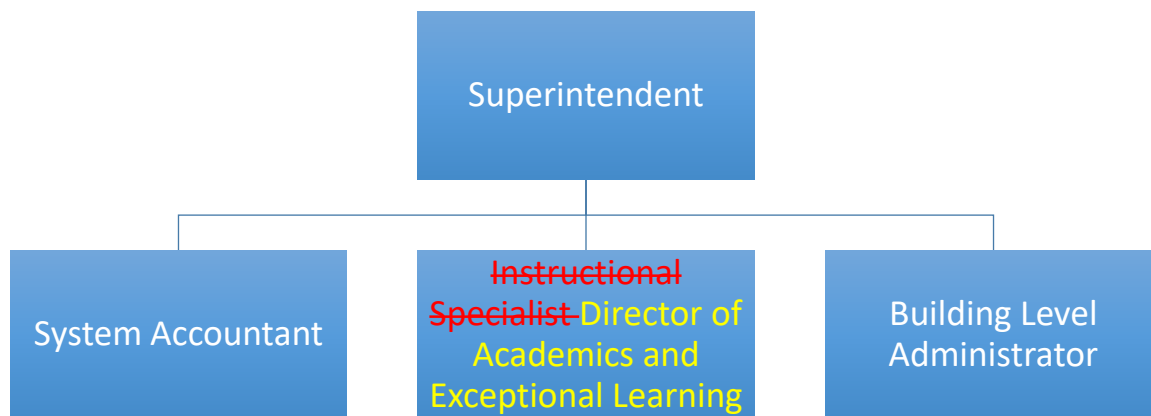
Financial reports for federal grants are compiled by the School System Accountant and verified by the Superintendent. In addition, the reports are prepared and submitted as specified by the financial reporting clause of each grant or contract award document. These reports include monthly and cumulative expenditures, project budgets, and a balance remaining column.

### C. Budgeting

### *The Planning Phase: Meetings and Discussions*

Before Receiving the Grant Award Letter: Discussions are held between the Superintendent, ~~instructional specialist~~ Director of Acedemics and Exceptional Learning, accountant, and building level administration to determine funding needs and priorities based on district goals and priorities. Early decisions for the budget are based on the prior year’s award, and adjustments are made once the grant award letter is received and funds are determined. Decisions are made based on needs assessments done each fall, and through monitoring of changes in needs throughout the fiscal year. The district, as well as the individual schools, complete an annual needs assessment each fall on Eplan. Before budget requests for new resources are considered, current and existing resources are reviewed to determine the specific needs for the upcoming fiscal year. Personnel responsible for the budget process include the Superintendent, School System Accountant, ~~instructional specialist~~, Director of Acedemics and Exceptional Learning, and school level administration. The time frames for the annual budget process begins in late fall preceding the upcoming fiscal year and continue through early spring. In the case of new awards granted throughout the fiscal year, the process is expedited based on needs, availability of funds, and amount of funds.

[LSS Board Policy 2.200 \(Annual Operating Budget\)](#)



### Reviewing and Approving the Budget:

Lakeland School System’s Budget Process for Federal Grants:

Based on feedback from the planning process, the ~~instructional specialist~~ Director of Acedemics and Exceptional Learning prepares an annual budget and submits it to the Superintendent for review. By the early spring of each year, the Superintendent will work with the School System Accountant

to determine the allowability of recommended expenditures. If a cost is determined to be not allowable, then the ~~instructional specialist~~ Director of Academics and Exceptional Learning will make necessary adjustments to meet allowability.

#### [LSS Board Policy 2.200 \(Annual Operating Budget\)](#)

Once the Superintendent determines that all budgeted items are allowable, the budget is presented to the Lakeland Board of Education for final review and approval. Generally, the budget receives final approval by ~~July 1~~ June 30.

Upon approval by the Lakeland Board of Education, a copy is presented to the City of Lakeland's Finance Officer to present to the Lakeland Board of Commissioners for approval. Once approved by the Lakeland Board of Commissioners, it is sent back to the School System Accountant where it is loaded into the accounting software system.

#### *After Receiving the grant award letter*

Upon receipt of the grant award letter, the Superintendent will meet with System Accountant, ~~instructional specialist~~ Director of Academics and Exceptional Learning, and building level administration to discuss adjustments that need to occur. If the amount is changed (increased or decreased), then a meeting is held to determine the best use of the funds awarded.

#### *Amending the Budget*

The process for amending the budget is as follows:

Amendments to budgets are initiated by the Superintendent or designee in Eplan. Once the amendments are approved by the Chief Financial Officer, CORE Consultant, and Superintendent, then a copy of the amended budget is given to the Lakeland School Board for approval. Once approved by the school board, the computer budget is modified; and, only then does spending occur.

#### *Budget Control*

Lakeland School System monitors its financial performance by comparing and analyzing actual results with budgeted results. Reports are provided monthly to the Lakeland School Board that compare budget with actual expenditures. These reports are public record and can be accessed by anyone. In addition, specific reports are generated upon request. The School System Accountant analyzes the reports of comparisons on a monthly basis and provides a copy of expenditures to the ~~instructional specialist~~ Director of Academics and Exceptional Learning and superintendent. If any potential area of concern is noted, the Superintendent and/or others involved are immediately notified to ensure no significant differences occur. Corrective actions could include budget amendments, program reevaluation, and error correction.

## Accounting Records

All electronic accounting records are kept in APECS Skyward. Copies of monthly expenditure reports are kept by the School System Accountant; and all accounts payables are kept by the school bookkeeper Administrative Assistant. Records are retained in compliance with the Internal and Compliance Manual. Journal entries are made within the accounting system by the School System Accountant and are approved within software by the Superintendent. All transactions are reconciled with the bank statement monthly by the System Accountant and signed off on by the Superintendent. These statements are kept in a binder in the system Accountant's office. The district follows the State of Tennessee Uniform Chart of Accounts, if applicable.

### D. Spending Grant Funds

The process to determine what items (i.e., goods and services) should be included in the budget is first and foremost, needs-based. District and school staff makes decisions on specific items to be included based on current assessment of student and staff needs.

While developing and reviewing the grant budget, the Superintendent, instructional specialist Director of Academics and Exceptional Learning, and building administrators should keep in mind the difference between direct costs and indirect costs.

#### *Direct and Indirect Costs Defined*

*Determining Whether a Cost is Direct or Indirect:* Direct costs are those costs that can be identified specifically with a particular final cost objective, such as a federal award, or other internally or externally funded activity, or that can be directly assigned to such activities relatively easily with a high degree of accuracy. 2 C.F.R. §200.413(a). Indirect costs are those that have been incurred for a common or joint purpose benefitting more than one cost objective, and not readily assignable to the cost objectives specifically benefitted, without effort disproportionate to the results achieved. 2 C.F.R. § 200.56. Costs incurred for the same purpose in like circumstances must be treated consistently as either direct or indirect costs. 2 C.F.R. § 200.413(a).

Identification with the federal award rather than the nature of the goods and services involved is the determining factor in distinguishing direct from indirect costs of Federal awards. Typical costs charged directly to a Federal award are the compensation of employees who work on that award, their related fringe benefit costs, the costs of materials and other items of expense incurred for the Federal award. 2 C.F.R. § 200.413(b). The salaries of administrative and clerical staff should normally be treated as indirect costs. Direct charging of these costs may be appropriate only if all of the following conditions are met:

- Administrative or clerical services are integral to a project or activity;
- Individuals involved can be specifically identified with the project or activity;
- Such costs are explicitly included in the budget or have the prior written approval of the federal awarding agency; and
- The costs are not also recovered as indirect costs. 2 C.F.R. § 200.413(c).

*Indirect Cost Rate:* TDOE approves indirect cost rates each year. **Lakeland School System does not currently utilizing indirect cost. All charges are direct cost.**

*Applying the Indirect Cost Rate:* Once the district has an approved indirect cost rate, the percentage is multiplied against the actual direct costs (excluding distorting items such as equipment, contracts in excess of \$25,000, pass-through funds, etc.) incurred under a particular grant to produce the dollar amount of indirect costs allowable to that award. 34 C.F.R § 75.564; 34 C.F.R. § 76.569. Once the District applies the approved rate, the funds that may be claimed for indirect costs have no federal accountability and may be used as if they were non-federal funds. For direct grants, reimbursement of indirect costs is subject to the availability of funds and statutory or administrative restrictions. 34 C.F.R. § 75.564.

Where a federal program has a specific cap on the percentage of administrative costs that may be charged to a grant, that cap must include all direct administrative charges as well as any recovered indirect charges.

### ***Determining Allowability of Costs***

Expenditures must be aligned with approved budgeted items. Any changes or variations from the state-approved budget and grant application need prior approval from the state.

When determining how the District will spend its grant funds, the Superintendent and ~~instructional specialist~~ **Director of Academics and Exceptional Learning** will review the proposed cost to determine whether it is an allowable use of federal grant funds *before* obligating and spending those funds on the proposed good or service. All costs supported by federal education funds must meet the standards outlined in EDGAR, 2 C.F.R.§ 200.403, which are provided in the bulleted list below. The superintendent and the ~~instructional specialist~~ **Director of Academics and Exceptional Learning** must consider these factors when making an allowability determination.

- **Be Necessary and Reasonable for the performance of the federal award.** District staff must consider these elements when determining the reasonableness of a cost. A cost is reasonable if, in its nature and amount, it does not exceed that which would be incurred by a prudent person under the circumstances prevailing at the time the decision to incur the cost was made. For example, reasonable means that sound business practices were followed, and purchases were comparable to market prices.

When determining reasonableness of a cost, consideration must be given to:

- Whether the cost is a type generally recognized as ordinary and necessary for the operation of the District or the proper and efficient performance of the federal award.
- The restraints or requirements imposed by factors, such as: sound business practices; arm's-length bargaining; federal, state and other laws and regulations; and terms and conditions of the federal award.
- Market prices for comparable goods or services for the geographic area.
- Whether the individuals concerned acted with prudence in the circumstances considering their responsibilities to the District, its employees, its students, the public at large, and the federal government.
- Whether the district significantly deviates from its established practices and policies regarding the incurrence of costs, which may unjustifiably increase the federal award's cost. 2 C.F.R. §200.404

While 2 C.F.R. §200.404 does not provide specific descriptions of what satisfies the "necessary" element beyond its inclusion in the reasonableness analysis above, necessary is determined based on the needs of the program. Specifically, the expenditure must be necessary to achieve an important program objective. A key aspect in determining whether a cost is necessary is whether the district can demonstrate that the cost addresses an existing need, and can prove it. For example, the district may deem a language skills software program necessary for a limited English proficiency program.

When determining whether a cost is necessary, consideration may be given to:

- Whether the cost is needed for the proper and efficient performance of the grant program.
- Whether the cost is identified in the approved budget or application.
- Whether there is an educational benefit associated with the cost.
- Whether the cost aligns with identified needs based on results and findings from a needs assessment.

- Whether the cost addresses program goals and objectives and is based on program data.
- **Allocable to the federal award.** A cost is allocable to the federal award if the goods or services involved are chargeable or assignable to the federal award in accordance with the relative benefit received. This means that the federal grant program derived a benefit in proportion to the funds charged to the program. 2 C.F.R. §200.405. For example, if 50% of a teacher’s salary is paid with grant funds, then that teacher must spend at least 50% of his or her time on the grant program.
- **Consistent with policies and procedures that apply uniformly to both federally-financed and other activities of the District.**
- **Conform to any limitations or exclusions set forth as cost principles in Part 200 or in the terms and conditions of the federal award.**
- **Consistent treatment.** A cost cannot be assigned to a federal award as a direct cost if any other cost incurred for the same purpose in like circumstances has been assigned as an indirect cost under another award.
- **Adequately documented.** All expenditures must be properly documented.
- **Be determined in accordance with general accepted accounting principles (GAAP), unless provided otherwise in Part 200.**
- **Not included as a match or cost-share, unless the specific federal program authorizes federal costs to be treated as such.** Some federal program statutes require the non-federal entity to contribute a certain amount of non-federal resources to be eligible for the federal program.
- **Be the net of all applicable credits.** The term “applicable credits” refers to those receipts or reduction of expenditures that operate to offset or reduce expense items allocable to the federal award. Typical examples of such transactions are: purchase discounts; rebates or allowances; recoveries or indemnities on losses; and adjustments of overpayments or erroneous charges. To the extent that such credits accruing to or received by the state relate to the federal award, they shall be credited to the federal award, either as a cost reduction or a cash refund, as appropriate. 2 C.F.R. §200.406.

Part 200's cost guidelines must be considered when federal grant funds are expended. As provided above, federal rules require state- and District-level requirements and policies regarding expenditures to be followed as well. For example, state and/or District policies relating to travel or equipment may be narrower than the federal rules, and the stricter State and/or District policies must be followed. Further, certain types of incentives are allowable under federal law, but are not allowable under State law.

***Selected Items of Cost***

Part 200 examines the allowability of 55 specific cost items (commonly referred to as Selected Items of Cost) at 2 C.F.R. §§ 200.420-200.475. These cost items are listed in the chart below along with the citation where it is discussed whether the item is allowable. Please do not assume that an item is allowable because it is specifically listed in the regulation as it may be unallowable despite its inclusion in the selected items of cost section. The expenditure may be unallowable for a number of reasons, including: the express language of the regulation states the item is unallowable; the terms and conditions of the grant deem the item unallowable; or State/local restrictions dictate that the item is unallowable. The item may also be unallowable because it does not meet one of the cost principles, such as being reasonable because it is considered too expensive. If an item is unallowable for any of these reasons, federal funds cannot be used to purchase it.

District personnel responsible for spending federal grant funds and for determining allowability must be familiar with the Part 200 selected items of cost section. The District must follow these rules when charging these specific expenditures to a federal grant. When applicable, District staff must check costs against the selected items of cost requirements to ensure the cost is allowable. In addition, State, District and program-specific rules may deem a cost as unallowable and District personnel must follow those non-federal rules as well.

The selected item of cost addressed in Part 200 includes the following (in alphabetical order):

<b>Item of Cost</b>	<b>Citation of Allowability Rule</b>
Advertising and public relations costs	2 C.F.R. § 200.421
Advisory councils	2 C.F.R. § 200.422
Alcoholic beverages	2 C.F.R. § 200.423
Alumni/ae activities	2 C.F.R. § 200.424
Audit services	2 C.F.R. § 200.425
Bad debts	2 C.F.R. § 200.426
Bonding costs	2 C.F.R. § 200.427
Collection of improper payments	2 C.F.R. § 200.428



Commencement and convocation costs	2 C.F.R. § 200.429
Compensation – personal services	2 C.F.R. § 200.430
Compensation – fringe benefits	2 C.F.R. § 200.431
Conferences	2 C.F.R. § 200.432
Contingency provisions	2 C.F.R. § 200.433
Contributions and donations	2 C.F.R. § 200.434
Defense and prosecution of criminal and civil proceedings, claims, appeals and patent infringements	2 C.F.R. § 200.435
Depreciation	2 C.F.R. § 200.436
Employee health and welfare costs	2 C.F.R. § 200.437
Entertainment costs	2 C.F.R. § 200.438
Equipment and other capital expenditures	2 C.F.R. § 200.439
Exchange rates	2 C.F.R. § 200.440
Fines, penalties, damages and other settlements	2 C.F.R. § 200.441
Fund raising and investment management costs	2 C.F.R. § 200.442
Gains and losses on disposition of depreciable assets	2 C.F.R. § 200.443
General costs of government	2 C.F.R. § 200.444
Goods and services for personal use	2 C.F.R. § 200.445
Idle facilities and idle capacity	2 C.F.R. § 200.446
Insurance and indemnification	2 C.F.R. § 200.447
Intellectual property	2 C.F.R. § 200.448
Interest	2 C.F.R. § 200.449
Lobbying	2 C.F.R. § 200.450
Losses on other awards or contracts	2 C.F.R. § 200.451
Maintenance and repair costs	2 C.F.R. § 200.452
Materials and supplies costs, including costs of computing devices	2 C.F.R. § 200.453
Memberships, subscriptions, and professional activity costs	2 C.F.R. § 200.454
Organization costs	2 C.F.R. § 200.455
Participant support costs	2 C.F.R. § 200.456
Plant and security costs	2 C.F.R. § 200.457
Pre-award costs	2 C.F.R. § 200.458
Professional services costs	2 C.F.R. § 200.459
Proposal costs	2 C.F.R. § 200.460
Publication and printing costs	2 C.F.R. § 200.461
Rearrangement and reconversion costs	2 C.F.R. § 200.462
Recruiting costs	2 C.F.R. § 200.463
Relocation costs of employees	2 C.F.R. § 200.464

Rental costs of real property and equipment	2 C.F.R. § 200.465
Scholarships and student aid costs	2 C.F.R. § 200.466
Selling and marketing costs	2 C.F.R. § 200.467
Specialized service facilities	2 C.F.R. § 200.468
Student activity costs	2 C.F.R. § 200.469
Taxes (including Value Added Tax)	2 C.F.R. § 200.470
Termination costs	2 C.F.R. § 200.471
Training and education costs	2 C.F.R. § 200.472
Transportation costs	2 C.F.R. § 200.473
Travel costs	2 C.F.R. § 200.474
Trustees	2 C.F.R. § 200.475

Likewise, it is possible for the State and/or District to put additional requirements on a specific item of cost. Under such circumstances, the stricter requirements must be met for a cost to be allowable. Accordingly, employees must consult federal, State and District requirements when spending federal funds. For example, often the State’s travel rules are more restrictive than federal rules, which means the State’s policies must be followed.

In order for a cost to be allowable, the expenditure must also be allowable under the applicable program statute (e.g., Title I of the Elementary and Secondary Education Act (ESEA), or the Carl D. Perkins Career and Technical Education Act (Perkins)), along with accompanying program regulations, non-regulatory guidance and grant award notifications.

The state and/or District rules related to some specific cost items are discussed below. District employees must be aware of these State and District rules and ensure they are complying with these requirements.

[LSS Board Policy 2.600 \(Bonded Employees\)](#)

[LSS Board Policy 5.110 \(Compensation Guides and Contracts\)](#)

[LSS Board Policy 2.401 \(Gifts and Bequests\)](#)

[LSS Board Policy 3.600 \(Insurance Management\)](#)

[LSS Board Policy 6.709 \(Student Fees and Fines\)](#)

[LSS Board Policy 2.402 \( Investment Earnings\)](#)

[LSS Board Policy 2.703 \(Audits\)](#)

[LSS Board Policy 2.804 \( Expenses and Reimbursements\)](#)

***Frequent Types of Costs***

*Travel:* Travel costs are the expenses for transportation, lodging, subsistence, and related items incurred by employees who are in travel status on official business of a grant recipient. Such costs may be charged on an actual cost basis, on a per diem or mileage basis in lieu of actual costs incurred, or on a combination of the two, provided the method used is applied to an entire trip and not selected days of the trip, and results in charges consistent with those normally allowed in like circumstances in the recipient's non-federally funded activities and in accordance with the recipient's written travel reimbursement policies. 2 C.F.R §200.474(a).

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 its written travel policy. In addition, if these costs are charged directly to the federal award, documentation must be maintained that justifies that (1) participation of the individual is necessary to the federal award; and (2) the costs are reasonable and consistent with the District's established policy. 2 C.F.R §200.474(b).

[LSS Board Policy 2.804 \(Expenses and Reimbursements\)](#)

**Local Travel Policies**

All travel by the employees of the Lakeland School System must be pre-approved by the Superintendent. Section 1 of travel expense report must be completed and approved prior to scheduling any travel. It is the responsibility of the employee making the request to make all travel arrangements including paying any applicable fees such as registration.

[Preview attachment SKMBT\\_C28413030607260.pdf](#)[SKMBT\\_C28413030607260.pdf](#)68 KB

***Helpful Questions for Determining Whether a Cost is Allowable***

In addition to the cost principles and standards described above, the Superintendent and the ~~instructional specialist~~ **Director of Academics and Exceptional Learning** can refer to this section for a useful framework when performing an allowability analysis. In order to determine whether federal funds may be used to purchase a specific cost, it is helpful to ask the following questions:

- Is the proposed cost allowable under the relevant program?
- Is the proposed cost consistent with an approved program plan and budget?
- Is the proposed cost consistent with program specific fiscal rules?

- For example, the District may be required to use federal funds only to supplement the amount of funds available from nonfederal (and possibly other federal) sources.
- Is the proposed cost consistent with EDGAR?
- Is the proposed cost consistent with specific conditions imposed on the grant (if applicable)?

As a practical matter, the superintendent and the instructional specialist should also consider whether the proposed cost is consistent with the underlying needs of the program. For example, program funds must benefit the appropriate population of students for which they are allocated. This means that, for instance, funds allocated under Title III of the Elementary and Secondary Education Act (ESEA) governing language instruction programs for limited English proficient (LEP) students must only be spent on LEP students and cannot be used to benefit non-LEP students.

Also, funds should be targeted to address areas of weakness, as necessary. To make this determination, the Superintendent, ~~instructional specialist~~ **Director of Academics and Exceptional Learning**, and building administrators should review data when making purchases to ensure that federal funds to meet these areas of concern.

#### E. Federal Cash Management Policy/Procedures

**Lakeland School System** will comply with applicable methods and procedures for payment that minimize the time elapsing between the transfer of funds and disbursement by the District, in accordance with the Cash Management Improvement Act at 31 C.F.R. Part 205. Generally, the District receives payment from the TDOE on a reimbursement basis. 2 C.F.R. § 200.305. However, if the District receives an advance in federal grant funds, the District will remit interest earned on the advanced payment quarterly to the federal agency. The District may retain interest amounts up to \$500 per year for administrative expenses. 2 C.F.R. § 200.305(b)(9).

According to guidance from the U.S. Department of Education (ED), when calculating the interest earned on ED grant funds, in any situation where the State draws from the G5 system in advance of the District using non-federal funds to pay vendors and/or employees, the only events and dates that are relevant are: 1) the date on which the federal grant funds are drawn down by the State; and 2) the date on which those funds are disbursed by the District. Any interest earned on those funds while on-deposit in the District's bank account after drawdown and before disbursement must be included in the interest earned calculation.

**Payment Methods**

Reimbursements: All reimbursements are based on actual disbursements, not on obligations. The District may initially charge federal grant expenditures to nonfederal funds.

The system accountant will request reimbursement for actual expenditures incurred under the federal grants **monthly**. Reimbursement requests will be submitted via ePlan. All reimbursements are based on actual disbursements, not on obligations.

The ~~grant~~ Accountant will request funds without prior approval since all spent funds go through a thorough process BEFORE being spent. The Federal Programs Director and ~~Finance Director~~ Accountant review reports frequently to ensure the spending/requests are accurate.

Consistent with state and federal requirements, Lakeland School System will maintain source documentation supporting the federal expenditures such as invoices, time sheets, payroll stubs, etc., and will make such documentation available for the TDOE review upon request.

Reimbursements of actual expenditures do not require interest calculations.

Advances: **Lakeland School System does not receive advances.** To the extent the District receives advance payments of federal grant funds, the District will strive to expend the federal funds on allowable expenditures within 72 hours of receipt. The District will hold federal advance payments in interest-bearing accounts, unless an allowable exception applies. The District will calculate interest earned on cash balances after 72 hours of receipt of advance payments.

F. Timely Obligation of Funds

**When Obligations are Made**

Obligations are orders placed for property and services, contracts and subawards made, and similar transactions during a given period that require payment by the non-Federal entity during the same or a future period. 34 C.F.R. § 200.71

The following table illustrates when funds are determined to be obligated under federal regulations:

If the obligation is for:	The obligation is made:
Acquisition of property	On the date which the District makes a binding written commitment to acquire the property

Personal services by an employee of the District	When the services are performed
Personal services by a contractor who is not an employee of the District	On the date which the District makes a binding written commitment to obtain the services
Public utility services	When the District receives the services
Travel	When the travel is taken
Rental of property	When the District uses the property
A pre-agreement cost that was properly approved by the Secretary under the cost principles in 2 C.F.R. part 200, Subpart E-Cost Principles.	On the first day of the project period.

34 C.F.R. §75.707; 34 C.F.R. §76.707.

***Period of Availability of Federal Funds***

All obligations must occur on or between the beginning and ending dates of the grant project. 34 C.F.R. §76.707. This period of time is known as the period of availability. The period of availability is dictated by statute and will be indicated in the grant award letter. Further, certain grants have specific requirements for carryover funds that must be adhered to.

State-Administered Grants: As a general rule, state-administered federal funds are available for obligation within the year that Congress appropriates the funds for. However, given the unique nature of educational institutions, for many federal education grants, the period of availability is 27 months. Federal education grant funds are typically awarded on July 1 of each year. While the District will always plan to spend all current grant funds within the year the grant was appropriated for, the period of obligation for any grant that is covered by the “Tydings Amendment” is 27 months, extending from July 1 of the fiscal year for which the funds were appropriated through September 30 of the second following fiscal year. This maximum period includes a 15-month period of initial availability, plus a 12-month period for carryover. 34 C.F.R. § 76.709. For example, funds awarded on July 1, 2015 would remain available for obligation through September 30, 2017.

Direct Grants: In general, the period of availability for funds authorized under direct grants is identified in the grant award letter.

For both state-administered and direct grants, regardless of the period of availability, the District must liquidate all obligations incurred under the award not later than 90 days after the end of the funding period unless an extension is authorized. 2 C.F.R. § 200.343(b). Any funds not obligated within the period of availability or liquidated within the appropriate timeframe are said to lapse and must be returned to the awarding agency. 2 C.F.R. § 200.343(d). Consequently, the District closely monitors grant spending throughout the grant cycle.

### ***Carryover***

*State-Administered Grants:* As described above, the Tydings Amendment extends the period of availability for applicable state-administered program funds. Essentially, it permits recipients to “carryover” any funds left over at the end of the initial 15 month period into the next year. These leftover funds are typically referred to as carryover funds and continue to be available for obligation for an additional 12 months. 34 C.F.R. § 76.709. Accordingly, the District may have multiple years of grant funds available under the same program at the same time.

The district Final Expenditure Report (FER) is reconciled and submitted to TDOE via ePlan. Any carryover funds are automatically transferred to the current grant application to be budgeted prior to expending. For programs with carryover limitations (i.e. ESEA Title I, Title III) a carryover waiver request letter will be submitted to TDOE when the carryover exceeds the cap.

*Direct Grants:* Grantees receiving direct federal grants are not covered by the 12 month Tydings period, i.e. ESEA-Title VI, SRSA. However, under 2 C.F.R. § 200.308, direct grantees enjoy unique authority to expand the period of availability of federal funds. The District is authorized to extend a direct grant automatically for one 12-month period. Prior approval is not required in these circumstances; however, in order to obtain this extension, the District must provide written notice to the federal awarding agency at least 10 calendar days before the end of the period of performance specified in the award. This one-time extension may not be exercised merely for the purpose of using unobligated balances.

Lakeland School System will seek prior approval from the federal agency when the extension will not be contrary to federal statute, regulation or grant conditions and:

- The terms and conditions of the Federal award prohibit the extension;
- The extension requires additional Federal funds; or
- The extension involves any change in the approved objectives or scope of the project. 2 C.F.R. § 200.308(d)(2).

**Lakeland School System will provide written notice to the federal awarding agency at least 10 calendar days before the end of the period of performance specified in the award period. The**

Superintendent, ~~instructional specialist~~ Director of Academics and Exceptional Learning, and System Accountant will make this decision, with the Superintendent making the final approval. Specific details per the awarding agency will be provided in a written notice from the Superintendent.

#### G. Program Income

##### *Definition*

Program income means gross income earned by a grant recipient that is directly generated by a supported activity or earned as a result of the federal award during the grant's period of performance. 2 C.F.R. § 200.80.

Program income includes, but is not limited to, income from fees for services performed, the use or rental of real or personal property acquired under federal awards, the sale of commodities or items fabricated under a federal award, license fees and royalties on patents and copyrights, and principal and interest on loans made with federal award funds. Interest earned on advances of federal funds is not program income. Except as otherwise provided in federal statutes, regulations, or the terms and conditions of the federal award, program income does not include rebates, credits, discounts, and interest earned on any of them. 2 C.F.R. § 200.80. Additionally, taxes, special assessments, levies, fines, and other such revenues raised by a recipient are not program income unless the revenues are specifically identified in the federal award or federal awarding agency regulations as program income. Finally, proceeds from the sale of real property, equipment, or supplies are not program income. 2 C.F.R. § 200.307.

##### *Use of Program Income*

The default method for the use of program income for the District is the deduction method. 2 C.F.R. § 200.307(e). Under the deduction method, program income is deducted from total allowable costs to determine the net allowable costs. Program income will only be used for current costs unless the District is otherwise directed by the federal awarding agency or pass-through entity. 2 C.F.R. § 200.307(e)(1). The LEA may also request prior approval from the federal awarding agency to use the addition method. Under the addition method, program income may be added to the Federal award by the Federal agency and the non-Federal entity. The program income must then be used for the purposes and under the conditions of the Federal award. 2 C.F.R. § 200.307(e)(2).

While the deduction method is the default method, the District always refers to the grant award letter prior to determining the appropriate use of program income.



Although very unlikely, if a grant were to generate income, then the proceeds would be identified with special revenue codes in the subfund that identifies solely the federal grant involved.

### III. Procurement System

Lakeland School System maintains the following purchasing procedures.

#### A. Responsibility for Purchasing

[LSS Board Policy 2.800 \(Expenditure of Funds\)](#)

[LSS Board Policy 2.805 \(Purchasing/Purchasing Authority\)](#)

Purchasing is initiated by employees of the Lakeland School System, as delegated by the **Instructional Specialist Director of Academics and Exceptional Learning**. The **Instructional Specialist Superintendent** approves requested purchases. ~~and then requests approval from the Superintendent.~~

The Administrative Assistant to the Superintendent is responsible for processing contracts and purchase orders. The ultimate authority over purchases is delegated to the Superintendent, which is indicated in the approval of a purchase order in **APECS Skyward**.

#### Purchase Methods

The type of purchase procedures required depends on the cost of the item(s) being purchased. Note, if state or local procurement policy is more restrictive than the federal purchase methods below, districts must always follow the most restrictive policy.

#### *Purchases up to \$10,000*

Tennessee Code Annotated (T.C.A.) allows a district to choose to follow the prescribed purchasing procedures of the district's local governing body, or to develop its own policies and procedures. T.C.A. § 49-2-203(a)(3)(B) states, "If the LEA chooses not to follow the local governing body's purchasing procedures, all purchases of less than ten thousand dollars (\$10,000) may be made in the open market without newspaper notice, but shall, whenever possible, be based upon at least three (3) competitive bids."

- Procurement Documents
  - [LSS Board Policy 2.808 \(Purchase Orders and Contracts\)](#)
  - [LSS Board Policy 2.807 \(Requisitions\)](#)
  - Purchase orders are used for all purchases
  - Procurement of purchase order happens after the department head calls/emails the Administrative Assistant to the Superintendent to initiate the process. Once determined there is enough money in the line item, then the Superintendent **and Instructional Specialist** approves the purchase order in **APECS Skyward**. A paper copy of the purchase order is printed and attached to the order form or original email, along with a copy of the check where final payment was issued. These documents

are kept by the ~~bookkeeper~~ Administrative Assistant until the end of the school year. Then, they are boxed and put into storage and retained for 10 years, which is required by the comptroller. The purchase order system used by the Lakeland School System pre-numbers the purchase orders to help prevent errors.

- Information required for purchase orders
  - [LSS Board Policy 2.808 \(Purchase Orders and Contracts\)](#)
  - Should include a description of the services to be performed or goods to be delivered;
  - A location where the services are to be performed or goods to be delivered:
  - The appropriate dates of service or delivery.
  - Account number
  - Person receiving the goods
  - Documentation and logs are kept in a computerized format and paper format in the school and central office.
- Responsibilities
  - Purchase orders are initiated by the department heads or their designees.
  - Purchase orders are typed by the Administrative Assistant, and then final approval rests with the Superintendent ~~and Instructional Specialist~~.
  - Contracts are approved by the Lakeland School Board

### *Purchases over \$10,000*

Tennessee Code Annotated (T.C.A.) allows a district to choose to follow the prescribed purchasing procedures of the district's local governing body, or to develop its own policies and procedures and purchase all supplies, furniture, fixtures, and material of every kind through the executive committee.

Regarding purchases estimated to exceed ten thousand dollars (\$10,000), T.C.A. § 49-2-203(a)(3)(A) states "All expenditures for such purposes may follow the prescribed procedures of the LEA's respective local governing body, so long as that body, through its charter, private act or ordinance has established a procurement procedure that provides for advertisement and competitive bidding, except that, if a newspaper advertisement is required, it may be waived in case of emergency. If the LEA chooses not to follow the local governing body's purchasing procedures, all expenditures for such purposes estimated to exceed ten thousand dollars (\$10,000) or more shall be made on competitive bids, which shall be solicited by advertisement in a newspaper of general circulation in the county, except that the newspaper advertisement may be waived in the event of an emergency. School districts that have a purchasing division may use a comprehensive vendor list for the purpose of soliciting competitive bids; provided, further, that

the purchasing division shall periodically advertise in a newspaper of general circulation in the county for vendors and shall update the list of vendors following the advertisement.”

Regarding purchases less than ten thousand dollars (\$10,000) T.C.A. § 49-2-203(a)(3)(B) states “If the LEA chooses not to follow the local governing body’s purchasing procedures, all purchases of less than ten thousand dollars (\$10,000) may be made in the open market without newspaper notice, but shall, whenever possible, be based upon at least three (3) competitive bids.”

- Procurement Documents
  - [LSS Board Policy 2.800 \( Expenditure of Funds\)](#)
  - [LSS Board Policy 2.808 \(Purchase Orders and Contracts\)](#) Purchase orders are used for all purchases
  - Procurement of purchase order happens after the department head calls/emails the Administrative Assistant to the Superintendent to initiate the process. Once determined there is enough money in the line item, then the Superintendent ~~and Instructional~~ approves the purchase order in **APECS Skyward**. A paper copy of the purchase order is printed and attached to the order form or original email, along with a copy of the check where final payment was issued. These documents are kept by the ~~bookkeeper~~ **Administrative Assistant** until the end of the school year. Then, they are boxed and put into storage and retained for 10 years, which is required by the comptroller. The purchase order system used by the Lakeland School System pre-numbers the purchase orders to help prevent errors.
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  - The appropriate dates of service or delivery.
  - Account number
  - Person receiving the goods
  - Documentation and logs are kept in a computerized format and paper format in the school and central office.
- Responsibilities
  - Purchase orders are initiated by the department heads or their designees.
  - Purchase orders are typed by the Administrative Assistant, and then final approval rests with the Superintendent ~~and Instructional Specialist.~~
  - Contracts are approved by the Lakeland School Board
- Required Number and Types of Quotations
  - [LSS Board Policy 2.806 \(Bids and Quotations\)](#)
  - Bids are received by the administrative assistant to the Superintendent

- 3 competitive bids are required unless buying off state contract or piggybacking.
- These bids must be received before a purchase order, requisition, or contract is made

Competitive Proposals: The technique of competitive proposals is normally conducted with more than one source submitting an offer, and either a fixed price or cost-reimbursement type contract is awarded. It is generally used when conditions are not appropriate for the use of sealed bids. If this method is used, the following requirements apply:

- Requests for proposals must be publicized and identify all evaluation factors and their relative importance. Any response to publicized requests for proposals must be considered to the maximum extent practical;
- Proposals must be solicited from an adequate number of qualified sources; and
- Contracts must be awarded to the responsible firm whose proposal is most advantageous to the program, with price and other factors considered.

For competitive proposals, EDGAR requires recipients to have a written method for conducting technical evaluations of the proposals received and for selecting recipients.

Architectural/Engineering Professional Services:The District may use competitive proposal procedures for qualifications-based procurement of architectural/engineering (A/E) professional services whereby competitors' qualifications are evaluated and the most qualified competitor is selected, subject to negotiation of fair and reasonable compensation. The method, where price is not used as a selection factor, can only be used in procurement of A/E professional services. It cannot be used to purchase other types of services though A/E firms are a potential source to perform the proposed effort.

Contract/Price Analysis: A cost or price analysis is performed in connection with every procurement action in excess of \$150,000, including contract modifications. 2 C.F.R. § 200.323(a). A cost analysis generally means evaluating the separate cost elements that make up the total price, while a price analysis means evaluating the total price, without looking at the individual cost elements.

The method and degree of analysis is dependent on the facts surrounding the particular procurement situation; however, Districts must come to an independent estimate prior to receiving bids or proposals. 2 C.F.R. § 200.323(a).

When performing a cost analysis, the District negotiates profit as a separate element of the price. To establish a fair and reasonable profit, consideration is given to the complexity of the work to

be performed, the risk borne by the contractor, the contractor's investment, the amount of subcontracting, the quality of its record of past performance, and industry profit rates in the surrounding geographical area for similar work. 2 C.F.R. § 200.323(b).

[LSS Board Policy 2.806 \(Bids & Quotations\)](#)

***Noncompetitive Proposals (Sole Sourcing)***

Procurement by noncompetitive proposals is procurement through solicitation of a proposal from only one source and may be used only when one or more of the following circumstances apply:

- The item is available only from a single source;
- The public exigency or emergency for the requirement will not permit a delay resulting from competitive solicitation;
- The federal awarding agency or pass-through entity expressly authorizes noncompetitive proposals in response to a written request from the District; or
- After solicitation of a number of sources, competition is determined inadequate.

*Educational Consultants and Similar Services*: In order to procure educational consultants in accordance with T.C.A. § 12-4-106(a)(1), the procurement must be paid with state or local funds:

Contracts by counties, cities, metropolitan governments towns, utility districts and other municipal and public corporations of the state, for legal services, fiscal agent, financial advisor or advisory services, educational consultant services and similar services by professional persons or groups of high ethical standards, shall not be based upon competitive bids, but shall be awarded on the basis of recognized competence and integrity. The prohibition against competitive bidding in this section shall not prohibit any entity enumerated from interviewing eligible persons or groups to determine the capabilities of such persons or groups.

[LSS Board Policy 2.806 \(Bids & Quotations\)](#)

***Cost Price Analysis and Sole Source***

A cost or price analysis will be performed for noncompetitive proposals when the price exceeds \$150,000.

B. Purchase Cards

Lakeland School does not use purchase cards.

### C. Full and Open Competition

All procurement transactions must be conducted in a manner providing full and open competition consistent with 2 C.F.R §200.319. In order to ensure objective contractor performance and eliminate unfair competitive advantage, contractors that develop or draft specifications, requirements, statements of work, or invitations for bids or requests for proposals must be excluded from competing for such procurements. Some of the situations considered to be restrictive of competition include but are not limited to:

- Placing unreasonable requirements on firms in order for them to qualify to do business;
- Requiring unnecessary experience and excessive bonding;
- Noncompetitive pricing practices between firms or between affiliated companies;
- Noncompetitive contracts to consultants that are on retainer contracts;
- Organizational conflicts of interest;
- 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
- Any arbitrary action in the procurement process.

EDGAR further requires the following to ensure adequate competition.

#### ***Geographical Preferences Prohibited***

Lakeland School System will conduct procurements in a manner that prohibits the use of statutorily or administratively imposed state, local, or tribal geographical preferences in the evaluation of bids or proposals, except in those cases where applicable federal statutes expressly mandate or encourage geographic preference. When contracting for architectural and engineering (A/E) services, geographic location may be a selection criterion provided its application leaves an appropriate number of qualified firms, given the nature and size of the project, to compete for the contract.

#### ***Prequalified Lists***

Lakeland School System will ensure that all prequalified lists of persons, firms, or products which are used in acquiring goods and services are current and include enough qualified sources to ensure maximum open and free competition. Also, Lakeland School System will not preclude potential bidders from qualifying during the solicitation period.

### ***Solicitation Language***

Lakeland School System will ensure that all solicitations incorporate a clear and accurate description of the technical requirements for the material, product, or service to be procured. Such description must not, in competitive procurements, contain features which unduly restrict competition. The description may include a statement of the qualitative nature of the material, product or service to be procured and, when necessary, must set forth those minimum essential characteristics and standards to which it must conform if it is to satisfy its intended use. Detailed product specifications should be avoided if at all possible.

When it is impractical or uneconomical to make a clear and accurate description of the technical requirements, a “brand name or equivalent” description may be used as a means to define the performance or other salient requirements of procurement. The specific features of the named brand which must be met by offers must be clearly stated; and identify all requirements which the offers must fulfill and all other factors to be used in evaluating bids or proposals. 2 C.F.R §200.319(c).

#### **D. Federal Procurement System Standards**

##### ***Avoiding Acquisition of Unnecessary or Duplicative Items***

Lakeland School System will avoid the acquisition of unnecessary or duplicative items. Additionally, consideration is given to consolidating or breaking out procurements to obtain a more economical purchase. And, where appropriate, an analysis must be made of leases versus purchase alternatives, and another other appropriate analysis to determine the most economical approach. These considerations are given as part of the process to determine the allowability of each purchase made with federal funds.

##### ***Use of Intergovernmental Agreements***

To foster greater economy and efficiency, Lakeland School System shall enter into state and local intergovernmental agreements where appropriate for procurement or use of common or shared goods and services.

**Agreements are entered into only after ensuring they are legal and beneficial for the school system.**

##### ***Use of Federal Excess and Surplus Property***

Lakeland School System shall consider the use of federal excess and surplus property in lieu of purchasing new equipment and property whenever such use is feasible and reduces project costs.



Since we are permitted to procure surplus government property without competitive bidding, our board encourages and actively seeks opportunities to find surplus property. This is not only for cost saving reasons but for assisting fellow governmental entities.

### ***Debarment and Suspension***

Lakeland School System shall award contracts only to responsible contractors possessing the ability to perform successfully under the terms and conditions of a proposed procurement. Consideration will be given to such matters as contractor integrity, compliance with public policy, record of past performance, and financial and technical resources.

Lakeland School System may not subcontract with or award subgrants to any person or company who is debarred or suspended and is required to check for excluded parties at the System for Award Management website before any procurement transaction. This list is located at: <http://www.sam.gov/>.

### ***Maintenance of Procurement Records***

Lakeland School System will maintain records sufficient to detail the history of all procurements. These records will include, but are not necessarily limited to the following: rationale for the method of procurement, selection of contract type, contractor selection or rejection, the basis for the contract price (including a cost or price analysis), and verification that the contractor is not suspended or debarred.

**All documents related to procurement are kept for the time specified by law.**

### ***Time and Materials Contracts***

Lakeland School System may use a time and materials type contract only if (1) after a determination that no other contract is suitable; and (2) if the contract includes a ceiling price that the contractor exceeds at its own risk. Time and materials type contract means a contract whose cost to the District is the sum of: the actual costs of materials, and direct labor hours charged at fixed hourly rates that reflect wages, general and administrative expenses, and profit.

Since this formula generates an open-ended contract price, a time-and-materials contract provides no positive profit incentive to the contractor for cost control or labor efficiency. Therefore, each contract must set a ceiling price that the contractor exceeds at its own risk. Further, LSS must assert a high degree of oversight in order to obtain reasonable assurance that the contractor is using efficient methods and effective cost controls.

**Lakeland School System does not do time and materials contracts.**

### ***Settlements of Issues Arising Out of Procurements***

Lakeland School System alone is responsible, in accordance with good administrative practice and sound business judgment, for the settlement of all contractual and administrative issues arising out of procurements. These issues include, but are not limited to, source evaluation, protests, disputes, and claims. These standards do not relieve the District of any contractual responsibilities under its contracts. Violations of law will be referred to the local, state, or federal authority having proper jurisdiction.

### ***Protest Procedures to Resolve Dispute***

Lakeland School System shall maintain protest procedures to handle and resolve disputes relating to procurements and, in all instances, disclose information regarding the protest to the awarding agency.

**Disagreements are brought before the School Board immediately. The bidders are told this in the initial bid solicitation.**

### **E. Conflict of Interest Requirements**

#### ***Standards of Conduct***

In accordance with 2 C.F.R. §200.18(c)(1), Lakeland School System maintains the following standards of conduct covering conflicts of interest and governing the actions of its employees engaged in the selection, award and administration of contracts.

No employee, officer, or agent may participate in the selection, award, or administration of a contract supported by a federal award if he or she has a real or apparent conflict of interest. Such a conflict of interest would arise when the employee, officer, or agent, any member of his or her immediate family, his or her partner, or an organization which employs or is about to employ any of the parties indicated herein, has a financial or other interest in or a tangible personal benefit from a firm considered for a contract.

The officers, employees, and agents of the District may neither solicit nor accept gratuities, favors, or anything of monetary value from contractors or parties to subcontracts, unless the gift is an unsolicited item of nominal value.

[LSS Board Policy 2.809 \(Vendor Relations\)](#)

[LSS Board Policy 1.107 \(Board Member Conflict of Interest\)](#)

[LSS Board Policy 1.108 \(Nepotism\)](#)

[LSS Board Policy 1.106 \(Code of Ethics/Conduct of Interest Disclosure Statement\)](#)

[LSS Board Policy 1.106a \(Code of Ethics/Conduct of Interest Disclosure Statement\)](#)

### ***Organizational Conflicts***

Organizational conflicts of interest means that because of relationships with a parent company, affiliate, or subsidiary organization, the non-Federal entity is unable or appears to be unable to be impartial in conducting a procurement action involving a related organization. 2 C.F.R. §200.318(c)(2).

### ***Disciplinary Actions***

[LSS Board Policy 5.501 \( Complaints and Grievances\)](#)

### ***Mandatory Disclosure***

Upon discovery of any potential conflict, Lakeland School System shall disclose in writing the potential conflict to the federal awarding agency in accordance with applicable federal awarding agency policy.

[LSS Board Policy 2.809 \(Vendor Relations\)](#)

**In the case of potential conflict, Lakeland School System will notify the applicable federal awarding agency.**

### F. Contract Administration

Lakeland School System shall maintain oversight to ensure that contractors perform in accordance with the terms, conditions, and specifications of their contracts or purchase orders 2 C.F.R. § 200.318.

[LSS Board Policy 2.808 \(Purchase Orders and Contracts\)](#)

## IV. Property Management Systems

### A. Property Classifications

Equipment means tangible personal property (including information technology systems) having a useful life of more than one year and a per-unit acquisition cost which equals or exceeds the lesser of the capitalization level established by the District for financial statement purposes, or \$5,000. 2 C.F.R. §200.33.

Supplies means all tangible personal property other than those described in §200.33 Equipment. A computing device is a supply if the acquisition cost is less than the lesser of the capitalization level established by the District for financial statement purposes or \$5,000, regardless of the length of its useful life. 2 C.F.R. §200.94.

Computing devices means machines used to acquire, store, analyze, process, and publish data and other information electronically, including accessories (or “peripherals”) for printing, transmitting and receiving, or storing electronic information. 2 C.F.R. §200.20.

Capital assets means tangible or intangible assets used in operations having a useful life of more than one year which are capitalized in accordance with GAAP. Capital assets include:

- Land, buildings (facilities), equipment, and intellectual property (including software) whether acquired by purchase, construction, manufacture, lease-purchase, exchange, or through capital leases; and
- Additions, improvements, modifications, replacements, rearrangements, reinstallations, renovations or alterations to capital assets that materially increase their value or useful life (not ordinary repairs and maintenance). 2 C.F.R. §200.12.

### B. Inventory Procedure

### C. [LSS Board Policy 2.702 \(Inventories\)](#)

### D. Inventory Records

For each equipment and computing device purchased with federal funds, the following information is maintained:

- Serial number or other identification number;
- Source of funding for the property;
- Who holds title;
- Acquisition date and cost of the property;

- Percentage of federal participation in the project costs for the federal award under which the property was acquired;
- Location, use and condition of the property; and
- Any ultimate disposition data including the date of disposal and sale price of the property.

#### District & Federal Programs Inventory Process

- Property that is sold - funds recouped or returned to the program from which they were purchased and new, similar items are purchased for replacement. When items are sold, the amount from the sale is returned to the appropriate funding source.
- Property that is lost or stolen - when items are reported as lost or stolen, an investigation is conducted and police and insurance claim filed when appropriate. A thorough investigation occurs to recover the lost or stolen item. In the event that it cannot be found, a police report is filed.
- Property that cannot be repaired - if the property has usable parts; they are retained for repairing other equipment. When items cannot be repaired, they are removed from inventory and discarded.
- The physical inventory is completed by the ~~Instructional Technology Specialist~~ District Technology Coordinator at each school. All items are accounted for in APECS Skyward. If items are missing, then a thorough search is conducted until found or reported as stolen.

#### E. Physical Inventory

A physical inventory of the property must be taken and the results reconciled with the property records at least once every two years.

A physical inventory is conducted annually at year-end by the ~~Instructional Technology Specialist~~ District Technology Coordinator. Inventory is also updated as items are either added or removed.

#### F. [LSS Board Policy 2.702 \(Inventories\)](#)

#### G. Property/Equipment Maintenance

In accordance with 2 C.F.R.313(d)(4), Lakeland School System maintains adequate maintenance procedures to ensure that property is kept in good condition.

Lakeland School System property is to be used for school system purposes only. Personal use of school property inventory is not permitted. If any item is broken, a work order is submitted to appropriate department for repair.

#### H. [LSS Board Policy 3.300 \(Equipment and Supplies Management\)](#)

## I. Lost or Stolen Items

Lakeland School System maintains a control system that ensures adequate safeguards are in place to prevent loss, damage, or theft of the property. Equipment that is stolen is reported to local jurisdiction of law enforcement.

District computing devices are allowed to be taken off-site. The ~~Instructional Technology Specialist~~ **District Technology Coordinator** is responsible for maintaining a check list of such property assigned to an employee. The staff is responsible for safeguarding property in their care. Computing property is tagged by the ~~Instructional Technology Specialist~~ **District Technology Coordinator** with a bar code tag identifying the item as property of the school district. Equipment that is lost or stolen is reported to the ~~Instructional Technology Specialist~~ **District Technology Coordinator** as soon as the item is noticed missing. A thorough search is conducted, and when appropriate, a police and insurance report is filed. All employees that take home their computer devices are required to purchase laptop insurance through the Lakeland School System.

Annual agreements are signed at individual schools and staff is responsible for safeguarding said property.

[LSS Board Policy 4.406 \(Acceptable Use Policy\)](#)

Equipment must be used in the program or project for which it was acquired as long as needed, whether or not the project or program continues to be supported by the federal award, and the Lakeland School System will not encumber the property without prior approval of the federal awarding agency and the pass-through entity. When no longer needed for the original program or project, the equipment may be used in other activities supported by the federal awarding agency, in the following order of priority: (1) activities under a federal award from the federal awarding agency which funded the original program or project; then (2) activities under federal awards from other federal awarding agencies.

During the time equipment is used on the project or program for which it was acquired, the equipment will also be made available for use on other projects or programs currently or previously supported by the federal government, provided that such use will not interfere with the work on the projects or program for which it was originally acquired. First preference for other use must be given to other programs or projects supported by the federal awarding agency that financed the equipment. Second preference is given to programs or projects under federal awards from other federal awarding agencies. Use for non-federally funded programs or projects is also permissible.

Redistribution of equipment and supplies are processed through the ~~Instructional Technology Specialist~~ **District Technology Coordinator** and based on the specific funding rules and regulations and the areas of need in the district.

If items purchased with federal funds are no longer needed by the original federal program, then those items are offered to other programs supported by other federal awarding agencies.

J. [LSS Board Policy 3.205 \(Security\)](#)

K. Disposal of Equipment

When it is determined that 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, the shall contact the awarding agency (or pass-through for a state-administered grant) for disposition instructions.

Generally, disposition of equipment is dependent on its fair market value (FMV) at the time of disposition. If the item has a current FMV of \$5,000 or less, it may be retained, sold, or otherwise disposed of with no further obligation to the federal awarding agency. If the item has a current FMV of more than \$5,000, the federal awarding agency is entitled to the federal share of the current market value or sales proceeds.

If acquiring replacement equipment, the District may use the equipment to be replaced as a trade-in or sell the property and use the proceeds to offset the cost of the replacement property.

[LSS Board Policy 2.403](#)

## V. Written Compensation Policies

### A. Time and Effort

#### *Time and Effort Standards*

All employees who are paid in full or in part with federal funds must keep specific documents to demonstrate the amount of time they spent on grant activities. C.F.R. § 200.430(i)(1). In addition, employees who are paid from state and local funds, but whose salaries are used for cost sharing or matching must also keep time and effort documentation. 2 C.F.R. § 200.430(i)(4).

Charges to federal awards for salaries and wages must be based on records that accurately reflect the work performed. In accordance with 2 C.F.R. § 200.430(i)(1), these records must:

- Be supported by a system of internal controls which provides reasonable assurance that the charges are accurate, allowable, and properly allocated;
- Be incorporated into official records;
- Reasonably reflect total activity for which the employee is compensated, not exceeding 100% of compensated activities;
- Encompass both federally assisted and all other activities compensated by the District on an integrated basis;
- Comply with the established accounting policies and practices of the District and
- Support the distribution of the employee's salary or wages among specific activities or costs objectives.

Budget estimates or other distribution percentages determined before the services are performed do not qualify as support for charges to federal awards, but may be used for interim accounting purposes provided that the system for establishing the estimates produces reasonable approximations of the activity actually performed. 200.430(i)(1)(viii).

#### *Time and Effort Procedures*

In order to meet the above requirements, all employees who must complete time and effort forms must submit either a semi-annual certification or a personnel activity report (PAR) as required below. The type of form depends on the number of cost objectives that an employee works on.

A cost objective is a program, function, activity, award, organizational subdivision, contract, or work unit of which cost data are described and from which provision is made to accumulate and measure the cost of processes, products, jobs, capital projects, etc. 2 C.F.R. § 200.28.



All employees who work on a single cost objective must complete a semi-annual certification. The semi-annual certification must be:

1. Completed at least every six (6) months;
2. Be signed by the employee or the supervisor with direct knowledge of the work being performed;
3. Reflect an after-the-fact distribution of the actual activity; and
4. Account for the total activity for which each employee is compensated.

All employees who work on multiple cost objectives must complete PARs that support the distribution of their salaries /wages that meet the following standards:

1. Reflect an after-the-fact distribution of the actual activity;
2. Account for the total activity for which each employee is compensated;
3. Are prepared at least monthly & coincide with one or more pay periods; and
4. Are signed by the employee.

The Lakeland School District uses semi-annual certifications. The principal of the school for which the employee is assigned will sign the semi-annual certifications, and these are completed at the end of each semester.

Lakeland School System  
Supervisor  
Certification / Assurance

I assure that the employees listed below are devoting 100% of their work time to allowable

\_\_\_\_\_ activities under \_\_\_\_\_

(Title I, Title IIA, Title IID, Title III, Title IV, Title V, Title VI, Title X, Consolidated Administration) funds derived from the

No Child Left Behind Act of 2001 for the period beginning \_\_\_\_\_ and ending

\_\_\_\_\_.

Name of Employee	Position	Name of Employee	Position

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Supervisor's Signature

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Date

---

Title

---

School Name / Job Location

NOTE: List all employees funded under applicable budgets (Title I, IIA, IID, III, IV, V, VI, X etc).  
Separate each program area with separate pages.

### ***Reconciliation and Closeout Procedures***

It is critical for payroll charges to match the actual distribution of time recorded on the monthly certification documents. Budget estimates or other distribution percentages determined before the services are performed do not qualify as support for charges to federal awards, but may be used for interim accounting purposes provided that the system for establishing the estimates produces reasonable approximations of the activity actually performed.

If using budget estimates for interim accounting purposes, EDGAR requires recipients to identify and enter into the records in a timely manner any significant changes in the corresponding work activity. Additionally, the recipient must have a system of internal controls to review after-the-fact interim charges made to a federal award based on budget estimates. All necessary adjustments must be made such that the final amount charged to the federal award is accurate, allowable, and properly allocated.

The Lakeland School System Accountant prepares a monthly statement of expenditures with budget comparison. The statement is approved and presented by the Superintendent to the school board members for review. This is done monthly.

All department budgets are reconciled with the system and city budgets at the end of each fiscal year. All time and effort certifications are reviewed bi-annually for accuracy and appropriate signatures and dates.

### ***Employee Exits***

[LSS Board Policy 5.200](#)(Separation Practices for Tenured Teachers)

[LSS Board Policy 5.201](#) (Separation Practices for Non-Tenured Teachers)

[LSS Board Policy 5.202](#) (Separation Practices for Non-Certified Employees)

## B. Human Resources Policies

The District shall have human resource policies which at least cover (1) how employees are hired (2 C.F.R.§200.430(a)(2));

[LSS Board Policy 5.106](#)(Application and Employment)

(2) the extent to which employees may provide professional services outside the District (2 C.F.R. §200.430(c));

[LSS Board Policy 5.607](#) (Non-school Employment)

(3) the provision of fringe benefits, including leave and insurance, (2C.F.R.§200.431)); (4) the use of recruiting expenses to attract personnel (2 C.F.R. §200.463(b)); and (5) reimbursement for relocations costs. 2C.F.R. §200.464.

[LSS Board Policy 5.300](#) (Short Term Leaves of Absence)

[LSS Board Policy 5.301](#)(Emergency and Legal Leave)

[LSS Board Policy 5.302](#)(Sick Leave)

[LSS Board Policy 5.303](#) (Personal and Professional Leave)

[LSS Board Policy 5.304](#)(Long Term Leave of Absence for Professional Personnel)

[LSS Board Policy 5.305](#)(Family and Medical Leave)

[LSS Board Policy 5.306](#)(Military Leave)

[LSS Board Policy 5.307](#) (Physical Assault Leave)

[LSS Board Policy 5.309](#) (Legislative Leave)

[LSS Board Policy 5.310](#)(Vacations and Holidays)

(4) the use of recruiting expenses to attract personnel (2 C.F.R. § 200.463(b));

[LSS Board Policy 5.801](#) ( Superintendent Recruitment and Selection)

and (5) reimbursement for relocations costs. 2 C.F.R. § 200.464.

## VI. Record Keeping

### A. Record Retention

Lakeland School System maintains all records that fully show (1) the amount of funds under the grant or subgrant; (2) how the subgrantee uses those funds; (3) the total cost of each project; (4) the share of the total cost of each project provided from other sources; (5) other records to facilitate an effective audit; and (6) other records to show compliance with federal program requirements. 34 C.F.R. §§76.730-.731 and §§75.730-.731. The District also maintains records of significant project experiences and results. 34 C.F.R. § 75.732. These records and accounts must be retained and made available for programmatic or financial audit.

The U.S. Department of Education is authorized to recover any federal funds misspent within 5 years before the receipt of a program determination letter. 34 C.F.R. § 81.31(c). Consequently, the District retain records for a minimum of five (5) years from the date on which the final Financial Status Report is submitted, unless otherwise notified in writing to extend the retention period by the awarding agency, cognizant agency for audit, oversight agency for audit, or cognizant agency for indirect costs. However, if any litigation, claim, or audit is started before the expiration of the record retention period, the records will be retained until all litigation, claims, or audit findings involving the records have been resolved and final action taken. 2 C.F.R. § 200.333.

**All records are kept for Lakeland School System in compliance with Internal Control and Compliance Manual for Tennessee Municipalities, which is longer than the Federal requirement of 5 years. When records are no longer needed, they are shredded for disposal.**

[LSS Board Policy 2.701](#) (Financial Records and Reports)

### B. Collection and Transmission of Records

**Records are kept both electronically and as paper copies within each department of the Lakeland School System. Records are transmitted electronically via ePlan to the state for monitoring, as well as provided physically when requested.**

[LSS Board Policy 2.701](#) (Financial Records and Reports)

### C. Access to Records

Lakeland School System provides the awarding agency, Inspectors General, the Comptroller General of the United States, and the pass-through entity, or any of their authorized representatives the right of access to any documents, papers, or other records of the District which are pertinent to the Federal award, in order to make audits, examinations, excerpts, and

transcripts. The right also includes timely and reasonable access to the District's personnel for the purpose of interview and discussion related to such documents.

D. Privacy

End users who interface with sensitive information are required to change passwords frequently. When any request is made for a copy of a school record, the individual must fill out the Request of Records form, show their driver's license and/ photo ID, and social security number.

[LSS Board Policy 6.600](#) (Student Records)

[LSS Board Policy 6.602](#) (Student Records Inspection and Correction Procedures)

[LSS Board Policy 1.407](#) (School Board Records)

[LSS Board Policy 6.601](#) (Student Records Annual Notification of Rights)

## **VII. Subrecipient Monitoring**

In the event that Lakeland School System awards subgrants to other entities, it is responsible for monitoring those grant subrecipients to ensure compliance with federal, state, and local laws. Monitoring is the regular and systematic examination of all aspects associated with the administration and implementation of a program. Each program office that awards a subgrant must have its own monitoring policy. This policy must ensure that any monitoring findings are corrected.

**Not applicable**

## VIII. Legal Authorities and Helpful Resources

The following documents contain relevant grants management requirements. Staff should be familiar with these materials and consult them when making decisions related to the federal grant.

- Education Department General Administrative Regulations (EDGAR)
  - <http://www2.ed.gov/policy/fund/reg/edgarReg/edgar.html>
- Uniform Administrative Requirements, Cost Principles and Audit Requirements for Federal Awards (2 C.F.R. Part 200)
  - <http://www.eC.F.R..gov/cgi-bin/text-idx?SID=ccccf77e01c9e6d4b3a377815f411704&node=pt2.1.200&rgn=div5>
  -
- USDE's Uniform Administrative Requirements, Cost Principles and Audit Requirements for Federal Awards (2 C.F.R. Part 3474)
  - [http://www.eC.F.R..gov/cgi-bin/text-idx?SID=ccccf77e01c9e6d4b3a377815f411704&tpl=/eC.F.R.browse/Title02/2C.F.R.3474\\_main\\_02.tpl](http://www.eC.F.R..gov/cgi-bin/text-idx?SID=ccccf77e01c9e6d4b3a377815f411704&tpl=/eC.F.R.browse/Title02/2C.F.R.3474_main_02.tpl)
- Federal program statutes, regulations, and guidance
  - <http://www.ed.gov/>
  - <http://www.tennessee.gov/education/districts/index.shtml>
- State regulations, rules, and policies
  - TN State Board of Education Rules and Regulations
    - [http://www.tn.gov/sbe/rul\\_reg.shtml](http://www.tn.gov/sbe/rul_reg.shtml)
  - TN State Board of Education Policies, Standards, and Guidelines
    - <http://www.tn.gov/sbe/policies.shtml>
  - TN Comptroller of the Treasury
    - <https://www.comptroller.tn.gov>
  - TN Internal School Uniform Accounting Policy Manual
    - [http://tennessee.gov/assets/entities/education/attachments/loc\\_fin\\_internal\\_sch\\_uniform\\_acct\\_policy.pdf](http://tennessee.gov/assets/entities/education/attachments/loc_fin_internal_sch_uniform_acct_policy.pdf)
- District regulations, rules, and policies
  - [District regulations, rules, and policies](#)
- Organizational Chart
  - <http://lakelandk12.org/about/system-contacts/>