

THE SCHOOL DISTRICT OF SPRINGFIELD R-12



UGG (Uniform Grant Guidance) Procedures Federal Programs FY2022

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Cash Management – Written Procedures (Effective 07/25/2016)

Background

As a recipient of direct and indirect Federal awards, Springfield Public Schools (SPS) is required to comply with the requirements contained in the Uniform Grant Guidance ([2 CFR Part 200](#)). As required by [2 CFR 200.302\(b\)\(6\)](#), SPS's financial management system must include written procedures addressing cash management and claiming of Federal funds in accordance with the requirements listed in [CFR 200.305](#). SPS's procedures are described below.

Procedures

At SPS, in order to comply with Federal Cash Management procedures, all federal grants will be on a reimbursement basis. Federal awards are overseen by various senior administrators with knowledge and experience of the specific Federal programs under their supervision. Prior to requesting reimbursements, these Federal grant administrators ("administrators") review grant expenditures to ensure the expenditures are allowable. In addition, prior to submitting requests for reimbursement, administrators provide documentation supporting the requests to the Director of Finance or a designated Finance Department staff member. An individual in the Finance Department reviews the documentation for accuracy and completeness, and then notifies the administrator to proceed with the request for reimbursement.

Administrators remain informed about grant requirements, including requirements pertaining to the allowability of costs, by attending trainings conducted by the Missouri Department of Elementary and Secondary Education (DESE). As the pass-through entity for many of the District's Federal awards, DESE provides many training opportunities every year to ensure the District's administrators are well-informed of Federal award requirements. For Federal awards that are not received through DESE, administrators use grant applications and grant award documents to determine which costs are allowable under the grants.

When Federal funds are received, the funds are deposited in an interest bearing account. Unless SPS receives an overpayment, no interest will be earned on federal funds, since these funds are received on a reimbursement basis. In the event that SPS receives an overpayment, the amount overpaid will be returned to DESE or the Federal awarding agency (if the award is a direct award). SPS will return the overpayment as soon as practical with any interest due, in accordance with Federal requirements.

Allowability of Costs – Written Procedures (Effective 07/25/2016)

Background

As a recipient of direct and indirect Federal awards, Springfield Public Schools (SPS) is required to comply with the requirements contained in the Uniform Grant Guidance ([2 CFR Part 200](#)). As required by [2 CFR §200.302 Financial management \(b\) \(7\)](#), SPS's financial management system must include written procedures addressing how the school district determines the allowability of costs for Federal awards in accordance with [Subpart E of 2 CFR 200](#) and with the terms and conditions of each specific Federal award. SPS's procedures are described below.

Procedures

At SPS, Federal awards are overseen by various senior administrators with knowledge and experience of the specific Federal programs under their supervision. These Federal grant administrators ("administrators") are responsible for preparing annual budgets, approving expenditures, requesting reimbursements, and completing reporting documents. Administrators remain informed about grant requirements, including requirements pertaining to the allowability of costs, by attending trainings conducted by the Missouri Department of Elementary and Secondary Education (DESE). As the pass-through entity for many of the District's Federal awards, DESE provides many training opportunities every year to ensure the District's administrators are well-informed of Federal award requirements. For Federal awards that are not received through DESE, administrators use grant applications and grant award documents to determine which costs are allowable under the grants.

All purchases using Federal awards are subject to the same internal controls implemented for all other purchases made for the district. Administrators are assigned specific general ledger expenditure codes to use for the purpose of recording the expenditures of Federal awards. Purchases made with Federal funds require an approved Request for Purchase form signed by the administrator prior to the order being placed. In addition, administrators must review and approve invoices submitted for payment. To indicate approval of the payment and to indicate that the administrator has reviewed the expenditure for allowability within the grant guidelines, the administrator signs the invoices before submitting them for payment.

Administrators monitor their assigned general ledger expenditure accounts through access to the District’s financial accounting system (MUNIS) throughout the year to ensure only appropriate expenditures are coded to Federal grant expenditure accounts.

Administrators review payroll costs for allowability during the budgeting process and throughout the grant cycle. Prior to spending grant awards, administrators determine which positions will be funded with Federal funding to ensure the payroll costs associated with those positions are allowable under the terms of the grant. Throughout the year, administrators monitor the general ledger expenditure accounts to ensure appropriate employee costs are recorded in the general ledger accounts used to track federally-funded payroll costs.

Managing Equipment - Written Procedures (Effective 07/25/2016)

Background

As a recipient of direct and indirect Federal awards, Springfield Public Schools (SPS) is required to comply with the requirements contained in the [Uniform Guidance \(2 CFR § 200\)](#). As required by [2 CFR §200.302 Financial management \(b\)](#), SPS’s financial management system must include written procedures addressing equipment management when purchased with federal funds (see also [§200.334 Retention requirements for records](#); [§200.314 Supplies](#); [§200.313 Equipment](#)). SPS’s procedures are described below.

Procedures

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 \$1,000.

The following items are subject to the inventory management and control requirements:

- Equipment items with an acquisition cost of \$1,000 or more per unit, and
- Items with an acquisition cost under \$1,000 per unit which are considered attractive or easily pilfered. These “sensitive” items include, but are not limited to:

- audio-visual equipment
- PDAs
- digital cameras
- laptops
- television sets
- DVD players
- iPads
- cell phones
- power tools
- computers and
- computer accessories
- Software
 - Software meeting the following criteria would be considered equipment and paid for out of the Capital Projects Fund and useful life of more than one year:
 - Software license that is bought that costs \$5,000 or more.
 - Internally created software costing \$5,000 or more.

Note: while the federal government maintains an acquisition cost of \$5,000 or more per unit for inventory management and control requirements, state regulations are more restrictive at the \$1,000 or more per unit threshold and therefore supersede the federal government amount.

Acquisition cost is defined as the cost of the asset including the cost to ready the asset for its intended use. Acquisition cost for equipment means the net invoice price of equipment including the cost of any modifications, attachments, accessories or auxiliary apparatus necessary to make it usable for the purpose for which it was acquired. Acquisition costs for software includes those development costs capitalized in accordance with generally accepted accounting principles (GAAP). Ancillary charges, such as taxes, duty, protective in transit insurance, freight, and installation may be included or excluded in the acquisition cost in accordance with the non-Federal entity's regular accounting practices

Inventory Management Controls

Equipment records must be maintained by the non-Federal entity and include:

- Description of the equipment
- Serial number or other identification number
- Funding source of the equipment
- Federal Award Identification Number (FAIN)
- Who hold the title, if applicable
- Acquisition date
- Cost of the equipment
- Percentage of federal participation in the cost of the equipment
- Location of the equipment
- Use and condition of the equipment
- Any ultimate disposition data including the date of disposal and sale price of the equipment

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

Note: The department has created a sample equipment inventory document that contains all of the required data elements plus a physical inventory certification. This document is located at the following address: <https://dese.mo.gov/financial-admin-services/general-federal-guidance>

A control system must be developed to ensure adequate safeguards to prevent loss, damage, or theft of the equipment. Any loss, damage, or theft must be investigated. Adequate maintenance procedures must be developed to keep the equipment in good condition.

Equipment Use

Equipment must be used by the non-Federal entity 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 non-Federal entity must not encumber the equipment without prior approval of the pass-through entity.

During the time that equipment is used on the project or program for which it was acquired, the non-Federal entity must also make equipment 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 must be given to programs or projects under Federal awards from other Federal awarding agencies.
- Third preference use for non-federally-funded programs or projects.
- If original intent is to be shared by multiple programs, cost should be charged or assigned to the Federal awards or cost objectives in accordance with relative benefits received.

When no longer needed for the original program or project, the non-Federal entity may transfer title to the equipment to the Federal Government or to an eligible third party provided that

- The non-Federal entity must be entitled to compensation for its attributable percentage of the current fair market value of the property.
- When original or replacement equipment acquired under a grant is no longer needed for the original project or program, the equipment may be transferred and used in other projects or programs currently or previously funded by the Federal awarding agency.
- The transfer of such items should be noted on the equipment inventory maintained by the non-Federal entity.

When acquiring replacement equipment, the non-Federal entity may use the equipment or be replaced as a trade-in or sell the equipment and use the proceeds to offset the cost of the replacement equipment.

Equipment Disposition

When the original or replacement equipment acquired under a Federal award is no longer needed for the original project or program the non-Federal entity must dispose of the equipment as follows:

- Items of equipment with a current per unit fair market value of \$5,000 or less may be retained, sold or otherwise disposed of with no further obligation to the

Federal awarding agency. The disposition of such items should be noted on the equipment inventory maintained by the non-Federal entity.

- Items of equipment with a current per-unit fair market value in excess of \$5,000 may be retained by the non-Federal entity or sold. The Federal awarding agency is entitled to an amount calculated by multiplying the current market value or proceeds from the sale by the Federal percentage of participation in the cost of the original purchase. If the equipment is sold, the Federal awarding agency may permit the non-Federal entity to deduct and retain from the Federal share \$500 or ten percent of the proceeds, whichever is less, for its selling and handling expenses. Proper sales procedures must be established to ensure the highest possible return.

Conflict of Interest - Written Procedures (Effective 07/25/2016)

Background

As a recipient of direct and indirect Federal awards, Springfield Public Schools (SPS) is required to comply with the requirements contained in the [Uniform Guidance \(2 CFR § 200\)](#). As required by [2 CFR §200.112 Conflict of interest](#), SPS must establish conflict of interest policies for Federal awards and disclose in writing any potential conflicts of interest to the Federal awarding agency or pass-through entity. SPS's policies are listed below.

Policies

At SPS, two Board of Education policies address conflicts of interest. [BBFA](#) addresses Board member conflicts of interest and [GBCA](#) addresses staff conflicts of interest. Please refer to these policies.

Procurement Procedures - Written Procedures (Effective 07/25/2016)

Background

As a recipient of direct and indirect Federal awards, Springfield Public Schools (SPS) is required to comply with the requirements contained in the [Uniform Guidance \(2 CFR § 200\)](#). As required by [2 CFR §200.318 General procurement standards](#), SPS's financial

management system must include written procedures addressing procurement procedures when utilizing federal funds. SPS's procedures are contained below in current board policies.

Policies

SPS's purchasing procedures are outlined on the District's website at this link: [Purchasing and Distribution Procedures](#)

Compensation Policies – Written Policy (Effective 07/25/2016)

Background

As a recipient of direct and indirect Federal awards, Springfield Public Schools (SPS) is required to comply with the requirements contained in the [Uniform Guidance \(2 CFR § 200\)](#). Requirements related to compensation are detailed in 2 CFR [§200.430 Compensation—personal services](#) and 2 CFR [§200.431 Compensation—fringe benefits](#). SPS's policies addressing compensation and leave are listed below. These policies address both wages and benefits.

Policies

Please refer to [Board of Education policies in section G](#) for SPS's policy addressing compensation and leave.

Travel Policy – Written Policy

Background

As a recipient of direct and indirect Federal awards, Springfield Public Schools (SPS) is required to comply with the requirements contained in the [Uniform Guidance \(2 CFR § 200\)](#). Requirements related to travel costs are detailed in [2 CFR §200.475 Travel costs](#). SPS's policy addressing travel costs is listed below.

Policies

Please refer to Board of Education Policy [DLCA](#) for SPS's current policy addressing travel costs. [DLCA](#) was adopted by the Board on March 15, 2016. From July 1, 2015 until March 15, 2016, Board Policy [DLC](#) addressed travel costs and page 5 of SPS's [Staff and Board Member Travel Procedures](#) also provides written documentation of the District's travel costs procedures during this time period.