Grants Manual - Office of Grants Management

Office of Grants Administration

February 2025 - Revised

Ohio Department of Education & Workforce

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OFFICE OF GRANTS MANAGEMENT
MISSION STATEMENT

Through the most efficient and innovative means available, the Office of Federal and State Grants Management will assist local constituencies in establishing effective fiscal management for grants, including acting as a centralized liaison between Department program functions and key educational stakeholders and providing expert technical assistance and monitoring to ensure grant fiscal provisions are met.

To accomplish this mission, we commit to the following:

- We will ensure funding flows to districts through review and approval of Project Cash Requests (PCRs) on a timely basis and in accordance with legal requirements;
- We will review and approve Final Expenditure Reports (FERs) and communicate results to key stakeholders in a timely basis;
- We will provide technical assistance for fiscal aspects of project administration on an ongoing basis;
- We will review audit reports from funded education entities and ensure proper stewardship for programs and funds are maintained;
- We will review indirect cost allocation proposals from school districts on a regular basis
  and determine the appropriate cost percentage available for recovery. Additionally, we will oversee and monitor the provisions of the established rate to ensure appropriate activities are captured and reported.

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INTRODUCTION

The Ohio Department of Education and Workforce's Office of Grants Management created this guide to help Chief Financial Officers (CFOs) and treasurers manage their districts' grants. The manual outlines the fiscal representatives' responsibilities, which include meeting many legal requirements, establishing and monitoring fiscal management procedures and sharing information with stakeholders. Read more about the roles and objectives of a treasurer [here](#).

The guide includes the Department's understanding of the analytical processes, requirements and expectations of a school district CFO or treasurer. It provides links to important information and step-by-step instructions for submitting Project Cash Requests and Final Expenditure Reports. We touch on topics and questions the Department receives from your colleagues. While the intent of this document is to provide guidance as you work on your district's state and federal grants; the information is not all inclusive of fiscal responsibilities and requirements.

For consistency, it is important to keep in mind federal regulations will be applicable to state grants unless stated otherwise by the awarding office.

The manual contains four sections:
       1.) Tools to manage your grant;
       2.) How to manage your grant;
       3.) Federal and State regulations and
       4.) Grant Monitoring and Closeout.

We hope the information is useful to you in your position as a school treasurer. If you have questions, please contact the Office of Grants Management at Grants.Management@education.ohio.gov. Our office is committed to providing accurate, useful information to help you manage your grants and stay in compliance with all applicable laws and guidelines.

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PART I: INTRODUCTION

GENERAL INFORMATION

THE IMPORTANCE OF COMMUNICATION

The Office of Grants Management recommends that grantees understand the importance of having a good communication plan in place. Communication is the key to an effective and efficient grant process. Good communication needs to occur both internally and externally. Internally, everyone involved with the grant should understand their roles and how the grant requirements affect them. Regular meetings to discuss updates and issues are recommended. In addition, please be sure to keep your contact information in the Continuous Comprehensive Improvement Plan (CCIP) current so information sent by the Department reaches the correct individuals.

The Department of Education and Workforce will distribute information regarding your grants using several methods. Be sure to read information regarding your grants that may come from the following sources:

- CCIP notes;
- CCIP Home Page (Announcements and Reminders);
- Newsletters;
- Email;
- CCIP History logs.

UPDATING OEDS AND CCIP ROLES

It is important that your contact information remains current in the CCIP at all times. This will ensure the appropriate person in your entity receives all communication from the Department of Education and Workforce. You can assign and update roles in the CCIP via the Ohio Educational Directory System (OEDS). Only persons who are assigned a role in the CCIP can be selected as a grant contact for the grantee's organization. For help with assigning grant contact roles, view the available guidance or contact the data custodian for your organization type. For information on updating roles in the CCIP application, view this presentation.

WHO TO CONTACT FOR ASSISTANCE

The Ohio Department of Education and Workforce has a variety of specialists to aid you in effectively managing your grant. This section provides you with an overview of the professionals available to help you achieve success.

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GRANTS MANAGEMENT FINANCIAL ANALYSTS

Grants Management financial analysts provide technical assistance for fiscal aspects of project administration. Financial analysts assist districts with fiscal management of grants by providing technical assistance and monitoring grants to ensure fiscal provisions are met.

Grants Management financial analysts can answer questions and help in the following areas:

- Project Cash Requests (PCR);
- Financial Expenditure Reports (FER);
- Indirect Cost Rates;
- Rebates and Refunds;
- Time and Effort;
- Fiscal Compliance Issues.

To find an organizations' s Grants Management financial analyst,
- Access the CCIP;
- Use the search feature (found in the left menu bar) to find your organization;
- Click "address book" on the left menu bar and note the Grants Management contact.
- Click on the name to see the contact information for your analyst.

You do not have to log into the CCIP to view the address book.

PROGRAM CONSULTANTS

Program consultants provide leadership and technical assistance to help school districts optimize their resources. The consultant for each grant application varies.

Program consultants can answer questions and help in the following areas:
- Completing the application;
- Budgets (including revisions);
- Allowable costs;
- Schoolwide pool;
- Time and effort;
- Supplement not supplant;
- Maintenance of Effort (MOE);
- 9/30 Report
- Program compliance issues.

To find the consultant assigned to your organization
- Access the CCIP;
  NOTE: You do not have to log into the CCIP to view the address book

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- Hover on "search" (found in the left menu bar)
- Click "Organization" and enter the IRN or organization name and click search.
- Click "address book" on the left menu bar, find the correct application and note the Department application contact.
- Click on the name to see the contact information for your consultant.

AREA COORDINATORS AND FISCAL CONSULTANTS

Area coordinators and fiscal consultants serve as liaisons between the more than 1,900 educational entities in the state and Department. They provide answers to countless school finance questions from district administrators, treasurers, board members, community schools, parents and concerned citizens.

Area coordinators provide oversight and technical assistance in the following areas:
- District of residence;
- Open enrollment;
- Tuition cost reimbursement;
- Excess costs;
- Catastrophic costs;
- Auxiliary services;
- Administrative cost reimbursements;
- Mobile unit repairs and replacements;
- Average Daily Membership;
- Various school operation questions or issues.

Fiscal consultants are available to assist districts with the following:
- Five-year Forecast;
- Questions about Caution, Watch and Emergency statuses;
- Financial monitoring of districts in fiscal caution, watch or emergency status;
- Facilitation of financial planning and supervision commission meetings (districts in fiscal emergency);
- Financial analysis;
- Account codes;
- Using common financial reports;
- Provide direct technical assistance to districts/schools.

INFORMATION TECHNOLOGY CENTERS (ITC OR A-SITES)

The data acquisition site assigned to your district can be found in the Ohio Education Directory (OEDS).

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A full list of information technology centers can be found by visiting the [Management Council Ohio Education Computer Network homepage](#) and navigating to "Connect", choose "Information Technology Centers" and "Find your ITC".

Information technology centers can assist with the following:
- Hardware and network support;
- Life, dental, health and vision insurance benefits programs;
- Student information system;
- Fiscal agency services;
- Workers compensation group rating program;
- Instructional services;
- Data processing services;
- EMIS, library automation and fiscal software, supporting and training,

Customer Assistance

OH|ID Login Assistance

To access a variety of services the Ohio Department of Education and Workforce offers each user must have their own OH|ID account to login, click [here](#) for login assistance.

Federal Funding Accountability and Transparency Act (FFATA) Reporting requires all recipients of federal awards to report purchases of $30,000 and greater under federal contracts. The act requires the reported data may be made available to the public via [USASpending.gov](#), for assistance with FFATA, click [here](#).

Unique Entity ID (UEI) - Formally known as DUNS
Federal grant recipients are required to have a UEI**.** The UEI helps track how federal grant funds are awarded and expended at the grantee level. For assistance with UEI numbers, click [here](#). To view the webpage click [here](#).

Indirect Costs (IC) or Facilities and Administrative Costs (F&A)
Indirect costs represent the expenses of doing business that are not readily identified with a particular grant, contract, project function or activity, but are not necessary for the general operation of the organization and the conduct of activities it performs. For assistance with indirect costs, click [here](#). To view the webpage click [here](#).

Important Dates

Mark your calendar for these important dates to remember.

JULY 1: EARLIEST SUBSTANTIALLY APPROVED DATE AVAILABLE - Submit applicable grant applications on or before this date to obtain the earliest substantially approved date. The date determines when a grantee can begin to obligate funds.

JUNE 30: PERIOD OF AVAILABILTY ENDS - All expenses that need to be charged to the grant should be obligated no later than this date.

**Be sure to review the definition of an obligation and "Factors Affecting Allowability of cost" guidance.

JUNE 30: BUDGET REVISION DEADLINE – This is the last day to submit a budget revision unless the grant's program office requires an earlier deadline.

AUG. 30: FINAL EXPENDITURE REPORT FOR PAPER GRANTS - This is the last day to issue payment for any obligations incurred by the end of the grant project, normally June 30.

SEPTEMBER 30: FINAL EXPENDITURE REPORT FOR CCIP GRANTS - This is the last day to issue payment for any obligations incurred by the end of the grant project, normally June 30 and liquidated by September 30.

NOVEMBER/DECEMBER: EXPIRING FUNDS REPORT (Formerly 9/30 Report) - For certain grantees only. For additional information, log in to the CCIP, and click on "Document Library"; search keyword "Expiring Funds Report".

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Part II: HOW TO MANAGE YOUR GRANT

SUMMARY

Successful management of your grant involves an understanding of key terminology and requirements. While monitoring grants for compliance, we have discovered that many issues stem from grantees not having a thorough understanding of the grant requirements or what is meant by a specific term. Before you can successfully manage your grant, you will need to understand all the grant requirements. To get you started, we have captured some of the more popular terms and requirements in this section. Sections II AND III also provide you with guidance on how to submit an application in the CCIP, request grant funds, and file the final expenditure report.

KEY DEFINITIONS AND REQUIREMENTS

TERMS AND DEFINITIONS

The Code of Federal Regulations (CFR) | Title 2 | Subtitle A | Chapter II provides a full list of Acronyms (§200.0) and Definitions (§200.1). Some frequently used key terms and definitions are below.

ACQUISITION COST

Means the cost of the asset including the cost to ready the asset for its intended use. Acquisition cost for equipment, for example, means the net invoice price of the equipment, including the cost of any modifications, attachments, accessories, or auxiliary apparatus necessary to make it usable for the purpose for which it is 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 in or excluded from the acquisition cost in accordance with the non-Federal entity's regular accounting practices. 2 CFR 200.1

ALLOCATION

Means the process of assigning a cost, or a group of costs, to one or more cost objective(s), in reasonable proportion to the benefit provided or other equitable relationship. The process may entail assigning a cost(s) directly to a final cost objective or through one or more intermediate cost objectives. 2 CFR 200.1

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FINANCIAL OBLIGATION

When referencing a recipient's or subrecipient's use of funds under a Federal award, financial obligation means orders placed for property and services, contracts and subawards made, and similar transactions that require payment by a recipient or subrecipient under a Federal award that will result in expenditures by a recipient or subrecipient under a Federal award. 2 CFR 200.1

You cannot enter into obligations** prior to the Substantially Approved Date. See the chart below to determine when obligations are made.   34 CFR §76.707 shows when a State or a subgrantee makes obligations for various kinds of property and services.

IF THE OBLIGATION IS FOR—	THE OBLIGATION IS MADE—
(a) Acquisition of real or personal property	On the date the grantee makes a binding written commitment to acquire the property.
(b) Personal services by an employee of the State or subgrantee	When the services are performed.
(c) Personal services by a contractor who is not an employee of the State or subgrantee	On the date on which the grantee makes a binding written commitment to obtain the services.
(d) Performance of work other than personal services	On the date on which the grantee makes a binding written commitment to obtain the work.
(e) Public utility services	When the grantee receives the services.
(f) Travel	When the travel is taken.
(g) Rental of real or personal property	When the grantee uses the property.
(h) A pre-agreement cost that was properly approved by the Secretary under the cost principles 2 CFR part 200, Subpart E - Cost Principles	On the first day of the grant or subgrant performance period.

**NOTE: Purchase Orders typically do not establish when an obligation is made.

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SUBSTANTIALLY APPROVED DATE (SAD)

When certain subgrantees may begin to obligate funds is found in 34 CFR §76.708.

The SAD is the date a subgrantee is legally allowed to begin obligating grant funds (See above chart for information regarding when obligations are made). When the grantee submits an application to the department as *Authorized Representative Approved*, in substantially approvable form, it is substantially approved. The date the application is submitted in substantially approval form becomes the grantees Substantially Approved Date and as of this date, legal obligations can be charged to the grant for expenses that meet the budget and grant requirements for the allowable use of funds.

The State may not authorize an applicant for a subgrant to obligate funds until the **later** of the following two dates:

1. The date that the State may begin to obligate funds (July 1) under 34 CFR §76.703; or

2. The date that the applicant submits its application to the State in substantially approvable form.

You can view the grants **original** substantially approved date on the project summary page or by navigating to the sections page for Revision 0 and then clicking on "Substantially Approved Date" at the bottom of the Page.

Note: A separate Substantially Approved Date will apply to any budget revisions. You are able to charge obligations in accordance with the revised budget as of the revised budgets substantially approved date.

Click here for instructions on how to view the substantially approved dates.

PERIOD OF PERFORMANCE

Means the total estimated time interval between the start of an initial Federal award and the planned end date, which may include one or more funded portions, or budget periods. Identification of the period of performance in the Federal award per §200.211(b)(5) does not commit the awarding agency to fund the award beyond the currently approved budget period.

Federal and state awards specify a period of time during which the grantee may use the federal or state funds. Where a funding period is specified, a subgrantee may charge to the award only costs resulting from obligations incurred and liquidated (paid) during the funding

period or period of performance. The period of availability begins on the grantees Substantially Approved Date. For most grants, the period of availability ends June 30th of the grant award year. This is the last day a district may <u>obligate</u> funds. A grantee must liquidate (pay) all obligations incurred during the period of performance not later than 90 days after the end of the funding period (for paper projects, obligations must be liquidated not later than 60 days after the end of the funding period or as specified in the program regulations).

Requirements

BUDGET REVISIONS
Budget revisions make certain changes to the last approved budget to meet federal and state grant requirements. - A budget revision is REQUIRED to add a function/object code not previously budgeted and when **obligations** are expected to exceed the approved budgeted amount in any object/function category by more than 10%.

See Grants Management [Budget Revision Requirements](#) for additional information. If a budget revision is necessary, follow the steps for [Submitting a Budget Revision in the CCIP](#).

INDIRECT COST RATE
Indirect cost rates allow grantees to recover those fiscal costs associated with the treasurer, human resources and operations, as well as maintenance of plant services and other administrative and business support services. These expenses are not directly related to the administration of federal grants and contracts. An approved indirect cost rate is required before indirect expenses can be charged to most federal grants.

The Indirect Cost Recovery Packet is on the Department's [Indirect Costs webpage](#).

Please email questions regarding indirect costs to indirectcost@education.ohio.gov.

MAINTENANCE OF EFFORT (MOE)
Maintenance of Effort is an Elementary and Secondary Education Act (ESEA) fiscal requirement under Section 9521 that requires districts to demonstrate that the level of state and local funding remains relatively constant from year to year, so that districts receive their full ESEA grant allocations. A district's education expenditures from the general fund must be at least 90 percent of the immediately preceding year's amounts. It is the state's responsibility to make an annual determination as to whether a district has maintained fiscal effort.

Guidance on MOE is available on the Department of Education and Workforce's [webpage](#).

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EXPIRING FUNDS REPORT (FORMERLY 9/30 REPORT)

This report is normally available in November/December of each year. The report is required for any local educational agencies (LEAs) that needs to provide expenditure information for selected programs for the period of July 1 through September 30. Note: **not** all LEAs are required to submit an Expiring Funds Report.

If you are required to file the Expiring Funds Report, the report will be displayed after following these steps:

NAVIGATION

Any grantee user with update or view access to the CCIP Consolidated Funding Application is able to view the Expiring Funds Report, **if the report is required**. To access the report, log in to CCIP, hover the cursor over Funding Application on the left menu and on the drop-down list that appears, select "Expiring Funds Report (formerly 9/30 Report". More detailed information is shown on the report itself.

Only the Treasurer/Fiscal Representative is able to SAVE data for this report.

If the report does not show up in the CCIP to the authorized user, it means the grantee does not have to complete the report.

DUE DATE OF REPORT

The due date of the report is listed on the report in a CCIP Note each year. After the due date, grantees will not be able to access the "Save Data" function on the report.

SUBMITTING A REFUND

Per Cash Management guidelines subgrantees are required to spend cash within 5 business days of receipt and on allowable costs within the period of performance. Accordingly, a grant's cash balance is expected to equal $0 at the end of each fiscal year. Occasionally, subgrantees may need to return cash-on-hand resulting from issues such as: correction of an administrative error or unallowable cost, refunds/rebates received from vendors, excessive drawdown request or failure to meet maintenance of effort.

If the subgrantee discovers excess cash-on-hand, there are specific steps that should be taken as outlined in Submitting a Refund.

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SUPPLEMENT NOT SUPPLANT (SNS)

Federal funds shall be used to supplement, and not supplant, non-federal funds that would otherwise be used for authorized activities under certain ESEA programs including, but not limited to, Title I-A, Title I-C, Title II-A, Title III, Title VI-B Rural and IDEA-B. These funds shall be used to supplement, and not supplant, any other federal, state or local education funds. In general, federal funds must enhance, add to and supplement services and programs that are offered with state and local funds; federal funds may not be used to replace any services and programs that were offered, or would otherwise be offered, using state and local funds.

USDOE guidance on Supplement, Not Supplant is available here.

TIME AND EFFORT

Federal regulation requires that all employees who are paid with federal funds, in full or in part, retain specific documentation to demonstrate the amount of time personnel spent on grant activities (Time and Effort records). For more information regarding time and effort, click here.

Please contact your Grants Management Consultant if you have questions regarding time and effort requirements. To find your Grants Management Consultant, click on "Address Book" on the CCIP Menu Bar, then click the consultant's name for contact information.

The Budget

SUBMITTING ORIGINAL BUDGET (REVISION 0)

Grant recipients are required to submit an application and budget for approval prior to accessing funds.   The Comprehensive Continuous Improvement Plan (CCIP) is a grants application and verification system that includes the Funding Application. The Funding Application contains the budget, the application and other related pages.

Access to CCIP requires four things: A, OH|ID account, Ohio Department of Education and Workforce profile, access to the CCIP application and the proper role in the Ohio Educational Directory System (OEDS).

The user roles described below must be assigned in OEDS. The person the named as the OEDS Administrator needs to assign these roles to program personnel in OEDS. For programs who use the Enterprise Application System (EAS), the roles also can be assigned by using the Personnel tab.

Required Roles – each can only be assigned to one person at a time (can be the same person for both roles if appropriate).

• **CCIP Authorized Representative** is the lead person with ultimate responsibility in an organization. This person gives final approval to the original grant application, budget revision requests and the Final Expenditure Report. The superintendent is the equivalent to this role in a school district.

The CCIP Authorized Representative and Superintendent designations are to be the same individual for public, community, and non-public school districts. *****

• **CCIP Fiscal Representative** is the person in an organization who has ultimate fiscal responsibility for fiscal matters. This person gives approval to the original grant application, budget revision requests, Project Cash Requests, and the Final Expenditure Report. The treasurer is the equivalent to this role in a school district.

The CCIP Fiscal Representative and Treasurer designations are to be the same individual for public, community, and non-public school districts. *****

> ****In rare instances where a smaller entity does not have staffing capacity to implement this level of segregation of duties, it may be acceptable for the same individual to be assigned to these roles. The Grants Administration office will help facilitate discussion to consider the exception. Please e-mail questions to grants.management@education.ohio.gov***

Optional Roles – can be assigned to multiple people.

• **Data View Funding CCIP** – This person can only look at the grant application data.
• **Data Entry Funding CCIP** – This person can enter the application data.

Individuals holding these roles will find the CCIP link available through the OH|ID portal, and do not need to take any other action to request access. After accessing the CCIP for the first time, users will go to the OH|ID account sign-in screen to enter the CCIP system going forward.

Once you have assigned the roles above, follow the steps in the Submitting a Budget in the CCIP guidance document to submit an application and learn about your substantially approved date.

If you need help with obtaining an OH|ID account, Department Profile or access to the CCIP application, access the Department's help portal webpage for assistance. Refer to the

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Updating OEDS and CCIP Roles section of this manual for assistance with assigning roles in OEDS.

BUDGET REVISION SUBSTANTIALLY APPROVED DATE

A budget revision is necessary if any cost to a given category increases or decreases by 10 percent or more after the budget has been approved. Revisions must be electronically submitted through the CCIP and can be submitted at any time throughout the year. The budget revision must include a narrative description in the history log of the CCIP justifying the change. Please check with the grants program office contact listed in the CCIP to confirm the last day a budget revision will be accepted in a particular fiscal year.

A separate Substantially Approved Date will apply to any budget revisions. You are able to charge obligations in accordance with the revised budget as of the revised budgets substantially approved date. **Note that the grant's original substantially approved date does not change.** However, be mindful of expenses you incurred under any previous budget since changes made in subsequent revised budgets affect expenses already incurred. For example, your original budget (Rev 0) reflects $1000 approved in supplies and you have incurred expenses totaling $600. In budget revision (Rev 1) you reduce this category to $500. The reduction results in $100 in supplies being unallowable. This amount would need to be removed from the grant and charged to another appropriate funding source.

CODING EXPENSES AND PROPER SUPPORT DOCUMENTATION

For help understanding where expenses should be coded in the budget, click here. In addition to providing coding information, this document also outlines the type of documentation grantees are required to maintain to support expenses being claimed on Project Cash Request (PCR) and Final Expenditure Reports (FER). Be sure to review this information before requesting grant funds. Expenses without proper support documentation are unallowable. The next section will assist you with drawing down your grant funds.

Project Cash Request (PCR) – (Expending Funds)

SUMMARY

After incurring allowable expenditures under the grant, grantees request funds by submitting a Project Cash Request (PCR). Funds requested must be for allowable expenses under the grant that were approved in the grant application and budget. Ensuring expenses are allowable requires knowledge of federal, state and program requirements. This guidance provides a summary of requirements as well as helpful links. Please be sure to review specific

grant requirements and direct questions regarding allowable cost to your program area consultant. Questions related to the cash request should be directed to the Office of Grants Management.

FEDERAL GUIDANCE

Federal guidance states that expenses charged to the grant must be:
1. Necessary and reasonable for the performance of the Federal award. Guidance to help in determining this requirement is outlined in Uniform Guidance 2 CFR 200.403, Factors Affecting Allowability of Costs.
2. Allocable to the Federal award in accordance with relative benefits received per 2 CFR 200.405, Allocable Costs.
3. Obligated on or after the date the grantee submits the application in substantially approvable form. Guidance states: the State may not authorize an applicant for a subgrant to obligate funds until the later of the following two dates:
    1. The date that the State may begin to obligate funds (July 1) under the Education Department General Administrative Regulations (EDGAR) 34 CFR §76.703; or
    2. The date that the applicant submits its application to the State in substantially approvable form.

For funds released for allowable expenditures, payment methods must minimize the time elapsing between the transfer of funds from the United States Treasury or the pass-through entity and the disbursement by the non-Federal entity whether the payment is made by electronic funds transfer, or issuance or redemption of checks, warrants, or payment by other means. All fund requests are governed by the Cash Management Improvement Act (31 CFR part 205), Uniform Administrative Requirements, Cost Principles, And Audit Requirements For Federal Awards (2 CFR 200), Education Department General Administrative Regulations (EDGAR) (34 CFR 76), and State regulations.

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STATE GUIDANCE

The following guidance provided by the state of Ohio outlines the details necessary for purchasing and tracking expenses in the grantee's accounting system. Guidance states the following:

> All local public offices shall maintain an accounting system and accounting records sufficient to enable the public office to identify, assemble, analyze, classify, record and report its transactions, maintain accountability for the related assets (and liabilities, if generally accepted accounting principles apply), document compliance with finance-related legal and contractual requirements and prepare financial statements required by rule 117-2-02 of the Ohio Administrative Code (OAC).

> Purchase orders should be used to approve purchase commitments and to encumber funds against the applicable appropriation account(s), as required by division (D) of section 5705.41 of the Revised Code. Purchase orders are not effective unless the fiscal officer's certificate is attached. The certificate should be attached at the time a commitment to purchase goods or services is made.

Review Ohio Administrative Code 117-2-02 for additional details on this requirement.

Most grantees are required to track revenue and expenditures using the USAS coding system. Entities that are not required to code using USAS must track expenses using a comparable coding system and be able to provide financial reports that separate revenue and expenses into similar categories.

GRANTS MANAGEMENT GUIDANCE

Federal requirements are applicable to state grants unless stated otherwise by the program area.

Before entering into obligations against the grant, it is recommended that you first review and understand these key terms and requirements. This document contains valuable information to help get you started with successfully managing your grant. The guidance will help enhance your understanding, answer questions and provide links to additional guidance concerning the following topics:

1. **Obligating Funds** – When a grantee can begin to obligate funds, when an obligation is made, substantial approved date and locating your date.
2. **Substantially Approved Date (SAD)** – What it is and where to find the date that applies to a grant.

3. **Period of Availability** – Beginning and ending date for a project.
4. **Budget Revisions** – When budget revisions are required. How budget revisions affect a SAD.
5. **Indirect Cost Rate** – Determining if a rate is needed and the type of expenses that an organization can recoup using a rate.
6. **Time and Effort** – Activity logs and semi-annual certifications. Determining if an alternative method is acceptable.
7. **Maintenance of Effort (MOE)** – The MOE requirement and applicable grants.
8. **Supplement, Not Supplant** – The supplement, not supplant requirement and applicable grants.
9. **September 30 Expiring Funds Report (aka (9/30) Report)** – The purpose of the Expiring Funds Report is to allow an entity with a federal award to report obligations/expenditures in the final months of a federal award (typically July 1 to September 30) to prevent these funds from expiring.

Understanding these terms and requirements may help to avoid incurring unallowable expenses.

The office of Grants Management often receives questions about how to charge travel that crosses fiscal years and stretch pay salaries. Guidance on Travel – Salaries is available on the Department's website. Charging food to federal grants also can be an area of concern. Be sure to review food purchases with your program consultant and view federal guidance on meetings and conferences to ensure food charges are permissible.

COMPLETE AND SUBMIT A PCR

Click on the following link for instructions to help you when completing a PCR.

Complete and Submit a PCR
Transferability/Schoolwide Pooling – Includes receipting of funds

Final Expenditure Report (FER)

SUMMARY
At the end of the grant period, you are required to submit a Final Expenditure Report (FER). A FER must be submitted to show how grant funds were expended during the grant period. Any unused funds will be reported on the FER and, if permitted, moved forward for the next fiscal year. If funds were awarded but no grant funds were expended during the year, an FER must be filed reflecting zero expenditures.

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FEDERAL GUIDANCE
Federal guidance states the following:

Monitoring and reporting program performance 2 CFR 200.329
Closeout 2 CFR 200.344
Collection of amounts due 2 CFR 200.346
Access to records 2 CFR 200.337

GRANTS MANAGEMENT GUIDANCE
Submit the Final Expenditure Report by Sept 30. Submitting the FER late increases the risk of an audit finding. The grantee also will be considered higher risk for monitoring purposes. The FER can be started as early as July 1 of each fiscal year and is due no later than Sept. 30. The closeout of the grant involves reporting but could include issues regarding carryover, refunds and rebates, reviews and audits. Guidance on these areas is provided.

The Office of Grants Management approves FERs on a first come, first approved basis, with state FERs being given priority.

PROGRAM AREA GUIDANCE
Carryover for applicable grants does not move forward into the current year's application until the FER is approved by the Office of Grants Management. To help ensure grantees have the maximum amount of availability to obligate their carryover funds, the Office of Federal Programs offers this guidance to grantees.

COMPLETE AND SUBMIT A FER
Click on the following link for instructions to help you when completing a FER.

How to Complete and Submit the FER

TOOLS AND LINKS (FAQS, REBATES AND REFUNDS, HOW TO SUBMIT FER)
- Frequently Asked Questions
- Rebates and Refunds
- How to Complete and Submit the FER

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Guidance Topics (Most Popular)

INTERNAL CONTROLS

SUMMARY
Strong internal controls promote efficient and effective operations, which help to safeguard assets against loss due to waste, abuse, mismanagement, errors and fraud. Effective internal controls also help ensure compliance with federal, state and local requirements. 2 CFR 200 Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards <mark>states</mark> a non-federal entity must have effective internal controls over the federal award.

FEDERAL GUIDANCE

2 CFR §200.303 Internal Controls – Subpart D.

STATE GUIDANCE

117-2-01 Internal Controls (Ohio Administrative Code)

GRANTS MANAGEMENT GUIDANCE
Federal regulations require written procedures. To ensure compliance with federal regulations, district policies and procedures currently in place and/or newly implemented must be maintained in writing. Approval of these written policies and procedures are dependent upon each district's policy. Since each district's approval authority is different, the Department cannot mandate board approval of written policies/procedures.

This is not a new requirement. Districts already should have documented internal control policies and procedures in place. Please review your existing internal control policies to ensure they are relevant and effective.

SELF-ASSESSMENT QUESTIONNAIRE
To assist districts/organizations with "Establishing and maintaining effective internal control over federal awards and provide reasonable assurance that federal funds are managed in a way that is compliant with federal statutes, regulations, and the terms and conditions of the federal award" in accordance with 2 CFR §200.303, the Department has created a tool will

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assist the organization's management in evaluating the current internal control structure and preparing for an audit.

To access the self-assessment questionnaire and a sample click the links below.

1. [District/Organization Internal Control Self-Assessment Questionnaire Tool](#)
2. [Sample](#)

 TOOLS AND LINKS (FEDERAL AND STATE REGULATIONS)

Uniform Guidance: Internal Controls:
      a.   [2 CFR §200.303](#)
      b.   [2 CFR §200.1](#) (Definition)

State of Ohio:
      a.   http://codes.ohio.gov/oac/117-2-01

US Department of Education:
      a.   https://www2.ed.gov/policy/fund/guid/uniform-guidance/internal-controls.html
      b.   https://www2.ed.gov/policy/fund/guid/uniform-guidance/index.html

CASH MANAGEMENT

Summary
Cash management is an important part of business success. Cash management involves tracking your cash needs and meeting cash needs as they occur. Cash management controls ensure accountability and safeguard grant funds. To help ensure grant funds are used as intended, grantees are expected to receipt and track grant funds properly and funds must be disbursed promptly on allowable expenditures under the grant.

Federal Guidance

2 CFR §200.305 Federal Payment

Grants Management Guidance
To comply with federal requirements, the Department is required to ensure that grant funds are drawn only to meet a grantee's immediate cash needs and minimize the amount of time between the drawdown and the use of funds from a subgrantee's bank account. The timing and amount of advance payments must be as close as is administratively feasible to the

actual disbursements by the non-federal entity. Therefore, grants management's guidance requires non-Federal entities to liquidate cash advances within five business days after receiving the funds. To help prevent districts from running a deficit in funds due to the five-day liquidation rule and to comply with 2 CFR §200.305, multiple advances can be requested in a one-month period.

Advances should only be requested to cover expenses that are ready to be paid. Advances can be requested to cover payroll expenses and invoices that have been received and will be paid within five business days of receiving grant funds. Advances should not be requested for encumbrances in which services and invoices have not been received unless you are certain that you will receive and pay the invoice within these established guidelines.

Subgrantees requesting advance payments are required to maintain both written procedures that demonstrate their willingness to comply with cash management guidelines and financial management systems that meet the standards for fund control and accountability as established in Uniform Guidance.

Written procedures for payment methods should address the following requirements:

- Whether federal funds are advance or reimbursement.

- For advance funds, how do you minimize time lapsing between receiving funds and disbursement?

- Meet standards for fund control and accountability in financial management system.

- Ensure funds requested are liquidated within five business days of receipt.

Project Cash Request Assurances

Cash management requirements are a part of every cash request. The treasurer/fiscal representative attests to the following assurances (sample below) each time a project cash request is submitted in the CCIP. You can find a link to the assurance on each PCR sections page.

1. As required by the Cash Management Improvement Act (codified as 31 CFR part 205 and 2 CFR 200), cash advances are limited to the immediate cash needs of the requesting entity. By submitting this cash request, the entity certifies that this request is in compliance with the Cash Management Improvement Act and 2 CFR 200 and advance funds will be disbursed within five business days of receipt.

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2. For cash requests submitted in July, August or September from a previous year grant, the entity certifies that the underlying obligations were made prior to June 30.

3. By submitting this cash request, the entity certifies that the obligations incurred under this project, for which funds are requested, were made within the period of availability outlined in the grant agreement.

4. Multiple advance requests may be submitted as long as the funds received are disbursed within five business days of receipt. Organization can request advance plus any applicable negative balance.

5. Advance payments must be as close as is administratively feasible to the actual disbursements. Advances must be pro-rated to meet immediate cash needs and advance funds must be disbursed within five business days of receipt.

6. By submitting this cash request, the LEA acknowledges and agrees to the terms and conditions set forth in the grant assurances.

Tools and Links
- Grants Management Guidance: [Cash Management](#)

DETERMINING ALLOWABLE COSTS

SUMMARY
Effective communication, both internal and external, coupled with effective and efficient internal controls will help ensure only allowable expenditures are charged to grant funds. 2 CFR 200 Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards requires that the non-federal entity's financial management systems be adequate to establish that such funds have been used according to federal statutes, regulations and the terms and conditions of the federal award. Unallowable expenditures may result in questioned costs or repayment of funds.

FEDERAL GUIDANCE
[2 CFR §200.302](#) - Financial Management
[2 CFR §200 Subpart E](#) - Cost Principles (Determining Allowable Costs)

GRANTS MANAGEMENT GUIDANCE
The grantees financial management system and processes must ensure the following:
Obligations incurred under grant projects are for expenditures that were made within the

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period of availability outlined in the grant agreement.
All goods are received and all services provided or delivered in time to substantially benefit the population being served in the current grant period. See [Factors Affecting Allowability of Cost](#) guidance.
[Budget revisions](#) are required prior to obligations in an object/function category exceeding 10 percent of the most current approved budget cell.

Below are some additional actions grantees should take to help ensure compliance with Uniform Guidance requirements.

Written procedures for allowability of costs should address the following requirements:
- Are the costs **necessary** and **reasonable** for the performance of the federal award and **is it allocable to the grant?**
- Identifies whether a cost is charged directly or indirectly.
- How decisions are made and who makes them?
- Are the costs adequately documented?
- Are costs consistent with 2 CFR 200?
- Procedures to monitor budget with obligations made and payments issued (within period of availability and benefit grant).

Before incurring cost for food, review federal guidance on hosting meetings and conferences. Discuss food expenses with the program area consultant to make certain these costs are allowable prior to obligating funds.

Review additional grant guidelines provided by the program area to determine if expenditures are allowable under the grant.

TOOLS AND LINKS

- Grants Management Guidance: [Factors Affecting Allowability of Costs 2015-001](#)
- Federal Guidance: [2 CFR §200.432](#) – Conferences (Hosting Meeting and Conferences)

TIME AND EFFORT

SUMMARY
Time and effort is required when charging salaries to federal grants. Keeping time and effort records helps ensure work performed is allocated properly and charged accurately.

Federal Guidance
[2 CFR §200.430](#) – Compensation – personal services

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STATE GUIDANCE

Time and effort is not applicable to state grants.

Per Auditor of State PowerPoint presentations about Uniform Guidance, changes per Uniform Guidance include the following:

1. Principles-based — not rules-based (requires judgment);
2. Gives entities the ability to implement the internal control systems and business processes that best fit their needs.

Charges to federal awards for salaries and wages must be based on records that accurately reflect the work performed. These records must:

- Be supported by a system of internal control, which provides reasonable assurance that the charges are accurate, allowable and properly allocated; Reasonably reflect the total activity for which the employee is compensated by the non-federal entity, not exceeding 100 percent of compensated activities.

GRANTS MANAGEMENT GUIDANCE

Semi-annual certifications are allowed when an employee's compensation is funded by only one federal grant and works solely on a single cost objective. An employee funded by a federal grant and the general fund would fall under this category.

Time and effort documentation is used when an employee's compensation is funded by more than one federal grant.

The substitute system of collecting time and effort is used when more than one federal grant funds an employee's compensation. Submit the proposed substitute time and effort documentation to the Ohio Department of Education and Workforce's Office of Grants Management for review and approval.

Additional time and effort FAQs can be found in the guidance link below.

TOOLS AND LINKS (FAQS AND GM GUIDANCE)

- **Frequently Asked Questions**
- Grants Management Guidance: Time and Effort

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PROCUREMENT

SUMMARY

Having effective procurement policies help to ensure grant funds are expended properly and create transparency in the purchasing process. Grantees must be certain to follow the procurement policies in place at their organizations when making purchases.

FEDERAL GUIDANCE

2 CFR Part 200 Subpart D – Procurement Standards

§200.320 (a)   – ***Informal procurement methods***
§200.320 (a)(1) – Micro-purchases
§200.320 (a)(2) – Small purchases

§200.320 (b)   – ***Formal procurement methods***
§200.320 (b)(1) – Sealed bids
§200.320 (b)(2) – Proposals
§200.320 (c)   – Noncompetitive procurement

STATE GUIDANCE

This is not a new requirement; districts already should have written procurement policies and procedures in place.

Ohio Revised Code
Sections: 3313.46 - Contract bidding process; exceptions
           9.312   - Factors to determine whether bid is responsive and bidder is responsible.

GRANTS MANAGEMENT GUIDANCE

Uniform Guidance breaks down procurement into five methods:

- Micro-purchases (defined FAR at 48 CFR part 2, subpart 2.1):
- Not to exceed $10,000 (see micro-purchase threshold exceptions)
- Greater than $50,000 with approval
- No quotations required if price is reasonable;
- To extent practicable, distribute purchases equitably among qualified suppliers.

- Small purchases:
- Purchases up to $250,000, as defined in 200.88 Simplified acquisition threshold;
- Get rate quotations from adequate number of qualified sources (your written Procurement policy should define what is adequate);
- No cost or price analysis is required.

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- Sealed bid (primarily used in construction projects):
  - Purchases greater than $250,000
  - Price is a major factor and formal process for bidding:
  - Two or more responsible bidders.

Competitive bid:
1. Purchases are more than $250,000, as defined in 200.88 Simplified acquisition threshold;
2. Use contracts, such as fixed price or cost reimbursement;
3. Formal RFP with predetermined evaluation methods for an adequate number of qualified sources.

- Noncompetitive procurement/Sole source (sometimes necessary due to uniqueness of the good or services or immediacy of need):
1. Noncompetitive method is available for procurement of any dollar amount;
2. Public emergency
3. Authorized by agency (or PTE)
4. Due to no competition, it must be authorized by agency.

CONFLICT OF INTEREST AND MANDATORY DISCLOSURES

SUMMARY
Uniform guidance requires grantees to disclose any conflicts of interest and any violations of federal criminal law in a timely manner.

FEDERAL GUIDANCE
2 CFR §200.112 - Conflict of Interest

2 CFR §200.113 – Mandatory Disclosures

GRANTS MANAGEMENT GUIDANCE
Written procedures for conflict of interest and mandatory disclosures should address the following requirements:
  (a) An organization should have a policy to disclose to the Ohio Department of Education and Workforce or U.S. Department of Education any potential conflict of interest.
  (b) The policy should include an annual disclosure (for audit purposes) of conflicts that arise during the year.
  (c) The policy must disclose, in a timely manner, any federal criminal law violation involving fraud, bribery or gratuity violations that could affect the federal award.

Failure to make the required disclosure can result in noncompliance.

FAMILY-FRIENDLY POLICY

SUMMARY
Federal regulations encourage non-federal entities to adopt family-friendly policies. Family-friendly policies allow employees to balance personal responsibilities and careers that contribute to federal awards.

FEDERAL GUIDANCE
2 CFR §200.475 - Travel Costs

GRANTS MANAGEMENT GUIDANCE
Grantees that decide to implement family-friendly policies should outline the policies in their written guidance. It also is suggested that expenses be reviewed with the program area consultant to ensure allowability.

Per Auditor of State PowerPoint presentations about Uniform Guidance:

Expenses charged to federal grants resulting from family-friendly policies should result from temporary dependent care costs above and beyond regular dependent care that directly results from travel to conferences. The expense must be:
- A direct result of the individuals travel for the federal award;
- Consistent with the non-federal entity's documented travel policy for all entity travel;
- Temporary during the travel period.

DISPOSITION OF REAL PROPERTY AND EQUIPMENT

SUMMARY
Written procedures for disposition of real property should already be in place at the district level. The district's policy can be more stringent than federal guidelines but cannot be more lax. Organizations without written policies are required to adhere to federal guidelines.

FEDERAL GUIDANCE
2 CFR §200.313 - Equipment
2 CFR §200.1 - Equipment (Definition**)**

STATE GUIDANCE
This is not a new requirement; districts already should have written procurement policies and procedures in place.

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STANDARDS FOR FINANCIAL AND PROGRAM MANAGEMENT

SUBPART D – FEDERAL AWARD REQUIREMENTS
Title 2 | Subtitle A | Chapter II | Part 200 | Subpart D

2 CFR §200.300 – §200.309

§200.300	Statutory and national policy requirements.
§200.301	Performance measurement.
§200.302	Financial management.
§200.303	Internal controls.
§200.304	Bonds.
§200.305	Federal payment.
§200.306	Cost sharing or matching.
§200.307	Program income.
§200.308	Revision of budget and program plans.
§200.309	Modifications to Period of Performance.

SUBPART E – COST PRINCIPLES
Title 2 | Subtitle A | Chapter II | Part 200 | Subpart E

2 CFR 200 §200.402 - §200.411

§200.402	Composition of costs.
§200.403	Factors affecting allowability of costs.
§200.404	Reasonable costs.
§200.405	Allocable costs.
§200.406	Applicable credits.
§200.407	Prior written approval (prior approval).
§200.408	Limitation on allowance of costs.
§200.409	Special considerations.
§200.410	Collection of unallowable costs.
§200.411	Adjustment of previously negotiated indirect (F&A) cost rates containing unallowable costs.

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Final Expenditure Reporting (FER)

Instructions can be found in Part III: SUBMITTING CASH REQUESTS AND EXPENDING FUNDS

Subrecipient Monitoring

SUMMARY

Federal regulations require the Department to monitor subrecipients for compliance and evaluate risk of noncompliance. 2 CFR 200 Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards states a pass-through entity must monitor subrecipient subaward activities to ensure proper use; compliance with regulations and terms and conditions of the subaward; ensure performance goals are met; and determine the monitoring approach based on risks posed by the entities. The risk-based monitoring approach is accomplished through completing annual risk assessment to determine the level and type of monitoring to be completed by entity. The risk assessment and related monitoring schedule is completed by the Office of School Finance in conjunction with the Department's program offices. The subrecipient monitoring results for federal awards are documented within the Department's Compliance Tracking System application, were applicable.

FEDERAL GUIDANCE

2 CFR §200.331 Requirements for pass-through entities – items (b) through (g) - All pass-through
entities must

(b) Evaluate each subrecipient's risk of noncompliance with Federal statutes, regulations, and the terms and conditions of the subaward for purposes of determining the appropriate subrecipient monitoring described in paragraph (e) of this section, which may include consideration of such factors as: (1) The subrecipient's prior experience with the same or similar subawards; (2) The results of previous audits including whether or not the subrecipient receives a Single Audit in accordance with Subpart F—Audit Requirements of this part, and the extent to which the same or similar subaward has been audited as a major program; (3) Whether the subrecipient has new personnel or new or substantially changed systems; and (4) The extent and results of Federal awarding agency monitoring (e.g., if the subrecipient also receives Federal awards directly from a Federal awarding agency).

(c) Consider imposing specific subaward conditions upon a subrecipient if appropriate as described in §200.207 Specific conditions.

(d) Monitor the activities of the subrecipient as necessary to ensure that the subaward is used for authorized purposes, in compliance with Federal statutes, regulations, and the terms and conditions of the subaward; and that subaward performance goals are achieved. Pass-through entity monitoring of the subrecipient must include: (1) Reviewing financial and programmatic reports required by the pass-through entity. (2) Following-up and ensuring that the subrecipient takes timely and appropriate action on all deficiencies pertaining to the Federal award provided to the subrecipient from the pass-through entity detected through audits, on-site reviews, and other means. (3) Issuing a management decision for audit findings pertaining to the

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Federal award provided to the subrecipient from the pass-through entity as required by §200.521 Management decision.

1. Depending upon the pass-through entity's assessment of risk posed by the subrecipient (as described in paragraph (b) of this section), the following monitoring tools may be useful for the pass-through entity to ensure proper accountability and compliance with program requirements and achievement of performance goals: (1) Providing subrecipients with training and technical assistance on program-related matters; and (2) Performing on-site reviews of the subrecipient's program operations; (3) Arranging for agreed-upon-procedures engagements as described in §200.425 Audit services.

(f) Verify that every subrecipient is audited as required by Subpart F—Audit Requirements of this part when it is expected that the subrecipient's Federal awards expended during the respective fiscal year equaled or exceeded the threshold set forth in §200.501 Audit requirements.
(g) Consider whether the results of the subrecipient's audits, on-site reviews, or other monitoring indicate conditions that necessitate adjustments to the pass-through entity's own records.
(h) Consider taking enforcement action against noncompliant subrecipients as described in §200.338 Remedies for noncompliance of this part and in program regulations.

Reference 200.331 Requirements for Pass-Through Entities – Subpart D

§200.328 Monitoring and reporting program performance.

(a) Monitoring by the non-Federal entity. The non-Federal entity is responsible for oversight of the operations of the Federal award supported activities. The non-Federal entity must monitor its activities under Federal awards to assure compliance with applicable Federal requirements and performance expectations are being achieved. Monitoring by the non-Federal entity must cover each program, function or activity. See also §200.331 Requirements for pass-through entities.

Reference 200.328 Monitoring and Reporting Program Performance – Subpart D

§200.338 Remedies for Noncompliance. If a non-Federal entity fails to comply with Federal statutes, regulations or the terms and conditions of a Federal award, the Federal awarding agency or passthrough entity may impose additional conditions, as described in §200.207 Specific conditions. If the Federal awarding agency or pass-through entity determines that noncompliance cannot be remedied by imposing additional conditions, the Federal awarding agency or pass-through entity may take one or more of the following actions, as appropriate in the circumstances:

(a) Temporarily withhold cash payments pending correction of the deficiency by the non-Federal entity or more severe enforcement action by the Federal awarding agency or pass-through entity.
(b) Disallow (that is, deny both use of funds and any applicable matching credit for) all or part of the cost of the activity or action not in compliance.
(c) Wholly or partly suspend or terminate the Federal award.

(d) Initiate suspension or debarment proceedings as authorized under 2 CFR part 180 and Federal awarding agency regulations (or in the case of a pass-through entity, recommend such a proceeding be initiated by a Federal awarding agency).

(e) Withhold further Federal awards for the project or program.

(f) Take other remedies that may be legally available.

Reference 200.338 Monitoring and Reporting Program Performance – Subpart D

GRANTS MANAGEMENT GUIDANCE

Both federal regulations and CCIP grant assurances require a subrecipient to provide access to any documents, papers or other records which are pertinent to the federal award to the pass-through agency (in accordance with 2 CFR 200.336) to enable the Department to complete its monitoring duties and requirements. The monitoring reviews and results are recorded within the Department's Compliance Tracking System application. Subrecipients should ensure that all monitoring requests are addressed, completed by the established deadlines and uploaded into the compliance application, where applicable.

TOOLS AND LINKS (FAQS, FEDERAL REGULATIONS)

Frequently Asked Questions

Uniform Guidance: Subrecipient Monitoring Requirements - - 2 CFR 200.521, 2 CFR 200.331, 2 CFR 200.511, 2 CFR 200.513 and 2 CFR 200.205

U.S. Department of Education: https://www.ed.gov/policy/fund/guid/uniform-guidance/

Single Audit Review Process

SUMMARY

Federal regulations require the Department to review all single audit reports released and establish a management decision for all audit findings related to federal awards made to subrecipients. The Department's management decisions establishing that appropriate action is taken on all deficiencies is required to be made within six months of acceptance of the audit report by the Federal Audit Clearinghouse. The final management decision is accomplished through the Office of School Finance working in conjunction with the Department's program offices to ensure corrective action is adequate to correct the finding(s). The Department's management decision results are documented within the Compliance Tracking System.

FEDERAL GUIDANCE

§200.521 Management decisions –

(a) General. The management decision must clearly state whether or not the audit finding is sustained, the reasons for the decision, and the expected auditee action to repay disallowed costs, make financial adjustments, or take other action. If the auditee has not completed corrective action, a timetable for follow-up should be given. Prior to issuing the management decision, the Federal agency or pass-through entity may request additional information or documentation from the auditee, including a request for auditor assurance related to the documentation, as a way of mitigating disallowed costs. The

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management decision should describe any appeal process available to the auditee. While not required, the Federal agency or pass-through entity may also issue a management decision on findings relating to the financial statements which are required to be reported in accordance with GAGAS.

(b) Federal agency. As provided in §200.513 Responsibilities, paragraph (a)(7), the cognizant agency for audit must be responsible for coordinating a management decision for audit findings that affect the programs of more than one Federal agency. As provided in §200.513 Responsibilities, paragraph (c)(3), a Federal awarding agency is responsible for issuing a management decision for findings that relate to Federal awards it makes to non-Federal entities.

(c) Pass-through entity. As provided in §200.331 Requirements for pass-through entities, paragraph (d), the pass-through entity must be responsible for issuing a management decision for audit findings that relate to Federal awards it makes to subrecipients.

(d) Time requirements. The Federal awarding agency or pass-through entity responsible for issuing a management decision must do so within six months of acceptance of the audit report by the FAC. The auditee must initiate and proceed with corrective action as rapidly as possible and corrective action should begin no later than upon receipt of the audit report.

(e) Reference numbers. Management decisions must include the reference numbers the auditor assigned to each audit finding in accordance with §200.516 Audit findings paragraph (c).

Reference 200.521 Management Decision – Subpart F.

GRANTS MANAGEMENT GUIDANCE

During the single audit oversight process, the Office of School Finance communicates with the appropriate Department program offices, depending on federal award affected by the finding(s), to determine if additional information is needed for identified corrective action to effectively meet deficiencies noted. Subrecipients are contacted via the compliance system and/or through email regarding any required next steps to be taken (repayment of questioned costs, financial adjustments, a plan of action to address findings and/or resubmit a more detailed plan of action) to ensure the finding(s) are adequately addressed and corrected. The goal is to assist in eliminating repeat findings in subsequent years by ensuring corrective action plans address the underlying cause of the issue and focus on successful correction of the single audit findings. The Department also incorporates technical assistance as needed to cover areas of concern with subrecipients.

Subrecipients should ensure all corrective actions and related supporting documentation requests are addressed, completed by the established deadlines and uploaded into the Grants Management Single Audit program within the Compliance Tracking System application.

TOOLS AND LINKS (FAQS AND FEDERAL REGULATIONS)

Uniform Guidance: Internal Controls - 2 CFR 200.521, 2 CFR 200.331, 2 CFR 200.511, 2 CFR 200.513 and 2 CFR 200.205

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US Department of Education - Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (includes a PowerPoint under Audit Requirements for ED-Developed Training and Resources)

UNIFORM GUIDANCE LINKS (FINAL REPORTING – CLOSEOUT)
Subrecipient Monitoring and Management
.330 Subrecipient and contractor determinations.
.331 Requirements for pass-through entities.

Records Retention and Access
.333 Retention requirements for records.
.334 Requests for transfer of records.
.335 Methods for collection, transmission and storage of information.
.336 Access to records.

Remedies for Noncompliance
.338 Remedies for noncompliance.
.339 Termination
.340 Notification of termination requirement
.341 Opportunities to object, hearings and appeals.
.342 Effects of suspension and termination.

CLOSEOUT
.343 Closeout.

Post-Closeout Adjustments and Continuing Responsibilities
.344 Post-closeout adjustments and continuing responsibilities.

COLLECTION OF AMOUNT DUE
.345 Collection of amounts due.

AUDITS
.501 Audit requirements.
.505 Sanctions.

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PART V: FREQUENTLY ASKED QUESTIONS

ASSIGNING ROLES IN OEDS

Can I assign two different people in the Fiscal Representative and Treasurer role?

No. These roles have the same responsibility. Only one person can be assigned in this interchangeable role. This role must be assigned before PCRs can be submitted.

CASH MANAGEMENT

Must I expend funds in five calendar days or five business days?

Expend funds within five business days of receipt.

Can I request advance funds to pay for outstanding encumbrances?

Since funds must be expended within five business days of receipt, it is recommended that funds be requested after the invoice has been received and is ready to be paid.

How long will it take to receive payment?

The Office of Grants Management must review and approve your cash request before sending to the fiscal office for processing. After Grants Management approves the payment request, the status of the project cash request updates to "ODE accounting system accepted." Once the payment is in this status, it normally takes three to seven days for state grant payments to process and five to 10 days for federal grant payments to process. Please time your request appropriately to prevent running a deficit in funds.

Can I submit multiple PCRs and request multiple advances in the same month?

Yes. Once a cash request status changes to "State Accounting System Paid," another request can be submitted immediately. There is no limit on the number of advances that can be submitted in a month. However, all advances are subject to cash management guidelines and must be liquidated within five days of receipt.

Who can I contact for help or questions on cash management?

Direct questions regarding internal controls to Grants.Management@education.ohio.gov

FINAL EXPENDITURE REPORTS

I need to submit my FER but I have a final payment due.

If the FER is submitted and there are funds due to the grantee, payment will automatically generate once the FER is approved by the Department. Be sure to report all expenses on the FER.

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The system will not allow me to change the status of my application to "FER draft started." Why can't I start my FER?

The treasurer/fiscal representative must change the status of the application to "FER draft started."

The following issues will prevent the treasurer from changing the status to "FER draft started":

❖ There is an active PCR. ALL PCRs must be in "PAID" status. If the pending PCR will result in the FER being late, please contact your Grants Management consultant for possible options.

❖ The current date is prior to July 1. FERs cannot be started until after the grant period has ended (June 30).

❖ The application is not in final approved status. Please contact your program consultant to get the application into final approved status.

I have a negative balance due for my grant, and submitting a PCR at this time will prevent me from submitting the FER on time. Once the Department approves the FER, will payment generate for the deficit amount?

Yes, payment will generate once the Office of Grants Management approves the FER. Report all allowable expenses on the FER, and verify the payment amount due (cash received minus amount expended) is accurate prior to submitting the FER.

I submitted my FER late. What are the consequences?

The consequences include the following:
- The organization cannot draw funds in the current application for that specific grant until you submit the FER.
- The organization is subject to an Audit Finding.
- It may affect the District Efficiency Rating (DER) when applying for competitive grants. This may affect the competitive funding levels.
- The Department will consider the grantee a higher risk entity for monitoring purposes.

INTERNAL CONTROLS

1. Who can I contact for help or questions on internal controls?

Direct questions regarding internal controls to Grants.Management@education.ohio.gov .

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PROJECT CASH REQUESTS

I am unable to create a PCR. Why?

Two things can cause this issue:

1. You do not have the role of Treasurer/Fiscal Representative in OEDS. Only the Treasurer/Fiscal Representative can create a PCR. After the Treasurer/Fiscal Representative creates the PCR, anyone assigned the "CCIP Data Entry Funding" role can complete the PCR and update the status through "Draft Completed" status. The treasurer must change the status to "Fiscal Representative Approved."

2. You have a pending PCR for that particular grant. In the CCIP, a new PCR cannot be created until the pending PCR status changes to "State Accounting System Paid." Once the active PCR status changes to "paid," a new PCR can be created.

Why and when do I need to attach documentation?

If the grant for which a PCR is being submitted is a reimbursement grant*, or if your entity is on reimbursement**, a transaction-level financial report must be attached to the PCR. In addition, any related receipts, invoices, contracts and proof of payment should be submitted. These documents can be scanned and uploaded as one complete file. If the file is too large to attach to the PCR, the documents can be emailed to your Grants Management contact. You can find your contact by clicking on "address book" in the CCIP. Click on the contact's name to find his or her email address and telephone number.

For grants that are not restricted to reimbursement only and grantees that are not in reimbursement status, documentation is not required to be attached to the PCR when submitted. However, if Grants Management determines that documentation is needed before the PCR can be approved, the PCR will be returned and an email sent to the treasurer/fiscal representative requesting the appropriate documentation be uploaded. Once the documentation has been uploaded, the PCR can be resubmitted for further review. Note, all PCRs are subject to review.

*Reimbursement Grant – Some grants are reimbursement-only grants. This means that grantees must incur (pay for) expenses before requesting funds for repayment. No advances funds can be requested.

**Entity on Reimbursement – Many grants allow advance payments. Due to cash management guidelines, advance payments must be liquidated within five business days of receipt. Grantees that continuously violate these cash management guidelines can be placed on reimbursement status. Grantees that are closing on the unauditable list, or in fiscal emergency also may be placed in reimbursement only status.

What type of documentation do I need to attach?

If you wish to attach documentation before submitting the PCR, attach a summary report. The summary report should show total amounts spent in each object. If a more detailed report or supporting documentation (invoices, contracts, proof of payment) is needed, the PCR will be returned so the additional information can be uploaded. Uploading the new documentation will override any previous document that was attached to the PCR.

How long will it take to receive my funds?

The Office of Grants Management's goal is to review and approve PCRs within three days of receipt. PCRs that are selected for more detailed review in which documentation is required may take longer depending on when the requested documents are submitted to the Department. All PCRs are subject to review by the Department. Please submit requested information promptly to help ensure your request is reviewed in a timely manner.

Once the PCR is approved by the Office of Grants Management, the status of the PCR changes to "ODE Accounting System Accepted" and approximate processing times are as follows:
- State-funded grants (fund codes 4XX): 3-7 days
- Federally funded grants (fund codes 5XX): 5-10 days

Why can't I request 100 percent of my funds?

Federal and state grant awards are subject to reduction or elimination by the United States Congress or Ohio General Assembly at any time, even following award and disbursement of funds. This information is part of your program assurances. In addition, some funds are awarded based on student count, which needs to be verified late in the fiscal year to ensure the appropriate amount of funds are released. Due to these conditions, the Department withholds 10 percent of the award until verification has taken place.

When will I be able to request the last 10 percent of my grant?

The remaining 10 percent is normally released in late March or early April after verification of the items described above.

Why is my available budget amount and total available amount different?

These amounts can vary due to the 10% being withheld by the DEPARTMENT as described above. These amounts can also vary if all funds have not been budgeted and approved.

Grant	Available Budget	Total Available Amount
Title I-A Improving Basic Programs	$41,944,685.11	$38,694,838.24
Title I-D Neglected	$512,021.74	$470,705.91
Title I-D Delinquent	$285,656.43	$273,735.48
Title I-C Migrant	$0.00	$0.00
Title I School Improvement Sub A	$1,430,842.93	$1,430,842.93

Must I expend funds in five calendar days or five business days?

Expend funds within five business days of receipt.

Can I request advance funds to pay for outstanding encumbrances?

Since funds must be expended within five business days of receipt, it is recommended that funds be requested after the invoice has been received and is ready to be paid.

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How long will it take to receive payment?

The Office of Grants Management must review and approve your cash request before sending to the fiscal office for processing. After Grants Management approves the payment request, the status of the project cash request updates to "ODE accounting system accepted." Once the payment is in this status, it normally takes three to seven days for state grant payments to process and five to 10 days for federal grant payments to process. Please time your request appropriately to prevent running a deficit in funds.

Can I submit multiple PCRs and request multiple advances in the same month?

Yes. Once a cash request status changes to "State Accounting System Paid," another request can be submitted immediately. There is no limit on the number of advances that can be submitted in a month. However, all advances are subject to cash management guidelines and must be liquidated within five days of receipt.

SINGLE AUDIT REVIEW PROCESS

Who can I contact for help or questions on single audit report monitoring process?

Direct questions regarding single audit report monitoring to ODEMonitoring@education.ohio.gov.

SUBRECIPIENT MONITORING

Direct questions regarding subrecipient monitoring to ODEMonitoring@education.ohio.gov.

TIME AND EFFORT

To what programs does this guidance apply?

Any Federal and state grant programs funded by ODE for local and state government entities, including community schools. Check award documents from other state and Federal agencies to determine the applicability of each cost principle to those grant programs and entities.

My school district has a schoolwide program in a building which consists of Title I, Title II-A, IDEA part B and local (general) funds. For a teacher working in that building, is it necessary to have time and effort documentation or can a semi-annual certification be used?

A semi-annual certification can be used because a schoolwide program is a single cost objective for a district.

The allocation that my district gets from the Department for IDEA part B does not cover all the costs of the teacher, and I am forced to use local (general) funds to fully fund the position. Does this teacher have to complete time and effort documentation because the teacher is paid from IDEA part B and the general fund, even though the teacher spends the entire time working on special education?

No. A semi-annual certification may be completed because the teacher is working on a single cost objective, special education programs and is funded from a single federal grant. The teacher is working within the confines of one program and does not deviate from that objective. Districts must be extremely cautious defining single cost objectives. Further guidance may be obtained from the Department's Office of Grants Management.

The allocation that my district gets from the Department for Title IV and Title V are not sufficient to cover the costs of an entire teacher. The district uses some portion of Title IV and Title V to pay for the salary and fringe benefits of the teacher and pays the remainder from the general fund. Can the teacher complete a semi-annual certification rather than keep time and effort documentation since both programs are from federal sources?

No. The allowable activities of the Title IV and Title V programs are vastly different and are funded by two different federal grants, so this does not constitute a single cost objective. Time and effort documentation must be maintained to remain in compliance.

I am a small local school district superintendent. There are three buildings in my district which each have one Title I teacher in a targeted assistance program. The Title I teacher is solely paid from Title I funds and no other sources. Can I, as a superintendent and ultimate supervisor of this teacher, complete the semi-annual certification for the three Title I teachers in my district?

No, the superintendent would not have first-hand knowledge of the activities of the teacher to complete the semi-annual certification.

I am a small local school district principal. There are three buildings in my district which each have one Title I teacher in a targeted assistance program. The Title I teacher is solely paid from Title I funds and no other sources. Can I, as a principal and ultimate supervisor of this teacher, complete the semi-annual certification for the three Title I teachers in my district?

Yes, if the principal had first-hand knowledge of the activities of the teacher.

My school district has hired a grant coordinator/manager to ensure that all provisions of the district's grant program are in compliance. As a result, the grant coordinator is paid from each of the grant programs in proportion to the amount of funding available. Because I am working on one cost objective, managing all the grants, can I do a semiannual certification rather than time-and-effort documentation?

To ensure that each program is only paying for its requisite costs, concurrent time-and-effort documentation must be maintained to indicate the work done for each program.

How does a district account for non-instructional time such as sick leave, vacation or in-services, when completing time-and-effort documentation?

The actual percentages found by using the time-and-effort documentation may be used as a reasonable basis for determining the cost of the compensated absences. This provision does not apply to severance pay.

What will auditors look for when testing for compliance with 2 C.F.R. 200 time-and-effort requirements?

Auditors will request the time-and-effort documentation to support those payroll charges for split funded personnel. For single source funded personnel, auditors will request the semi-annual certifications. Additionally, the auditors may request other documentation which would support those charges, typically in support of the normal payroll testing.

Our local teacher's union has instructed union members to not sign the semi-annual certifications and time-and-effort logs because they are afraid the documents will be used to apply a reduction in force if the grant funding ends. As the treasurer, what should I do to comply with the requirements?

For semi-annual certifications, the employee does not have to sign if a supervisor with first-hand knowledge of the work signs the certification. For time-and-effort logs, these must be signed by the employee as part of the payroll process in the district. ODE strongly discourages refusals to sign as (1) signing the certification has no bearing on whether the grant is funded in the future and (2) it does not consistently ensure that funds have been used according to the requirements outlined in the grant agreement. Districts are cautioned that failure to sign the documentation could warrant the repayment of disallowed or questioned costs for the grant program.

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