



Book	Policy Manual
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6110 - **GRANT FUNDS**

It is the objective of the Board of Managers to provide equal educational opportunities for all ~~School~~ Cooperative students. Government agencies, as well as foundations, businesses, and individuals, periodically offer both human and material resources to the Cooperative that benefit students and the educational program. Therefore, it is the intent of the Board to consider grant proposals and applications for their potential to enhance the educational opportunities, the educational environment, and the physical and mental growth for each student.

The Director shall review new Federal education legislation and prepare proposals for programs ~~s/he~~ the Director deems would be of aid to the students of this Cooperative. The Director shall approve each such proposal prior to its submission, and the Board shall approve all grants resulting from such proposals.

The Board regards available Federal funds of aid to ~~local school cooperatives~~ the Cooperative and ~~communities~~ community as a public trust. It forbids the use of Federal monies for partisan political activities and for any use that would not be in accordance with Federal regulations and guidelines.

No Federal funds received by the Cooperative shall be used to:

- A. develop or distribute materials or operate programs or courses of instruction directed at youth that are designed to promote or encourage sexual activity, whether homosexual or heterosexual;
- B. distribute or aid in the distribution by any organization of legally obscene materials to minors on school grounds or at school-sponsored activities;
- C. provide sex education or HIV-prevention education in schools unless that instruction is age-appropriate and includes the health benefits of abstinence; or
- D. operate a program of contraceptive distribution in schools.

The Director shall review grant opportunities and authorize the development of proposals.

Grant Proposal Development

- A. All grant proposals must support at least one (1) Cooperative goal or priority.
- B. For projects where grant funds will not cover the entire cost of project implementation, additional fund sources must be identified, documented, and approved during the internal review process.

Grant Proposal Internal Review

- A. Each grant proposal shall be reviewed and approved by the Director prior to submission to the funding source.
- B. The Director may identify a project director prior to proposal submission.
- C. ~~()~~ The Director shall present the following proposals to the Board for approval:
 - 1. ~~()~~ government-funded proposals, regardless of the amount;
 - 2. ~~()~~ proposals with budgets exceeding \$ 10,000 ; or
 - 3. ~~()~~ multi-school or Cooperative-wide proposals.
- D. The Director may accept privately funded or foundation grants of less than \$ 10,000 for individual schools.

Grant Administration

- A. The administration of grants will adhere to all applicable Federal, State, local, and grantor rules and regulations, including the terms and conditions of the Federal awards, as well as Cooperative policies and administrative guidelines.
- B. The Director is responsible for the efficient and effective administration of grant awards through the application of sound management practices.
- C. The Director is responsible for administering grant funds in a manner consistent with underlying agreements, applicable statutes, regulations, and objectives, and the terms and conditions of the grant award.
- D. The Cooperative, in recognition of its unique combination of staff, facilities, and experience, shall employ internal controls, including the organizational and management strategies necessary to assure proper and efficient administration of grant awards.
- E. All Federal funds received by the Cooperative will be used in accordance with the applicable Federal law and regulations and the terms and conditions of the Federal award. The Director shall require that each draw of Federal monies be aligned with the Cooperative's payment process (whether reimbursement, cash advance, or a combination). If funds are permitted to be drawn in advance, all draws will be as close as administratively feasible to the related program expenditures and that, when restricted, such monies are used to supplement programs and funding and not to supplant or replace existing programming or current funding.

Maintenance of Effort (MOE) and Maintenance of Equity (MOEquity) requirements of the Federal program will be met in accordance with the requirements of the specific funded program. The Cooperative shall maintain appropriate documentation and records to substantiate compliance or to justify allowable exceptions, exemptions, or waivers.

- F. (☒) The Director is authorized to sign related documents for grant administration, including documents required for submittal of grant proposals.

G. ~~() Written amendments requiring the Director's signature shall be presented to the Board for approval.~~

H. (x) Employee positions established through the use of grant funding shall terminate if and when the related grant funding ceases.

I. ~~() Program reports including but not limited to audit, site visits, and final reports shall be submitted to the Director for review and distribution to the Board and other appropriate parties.~~

Financial Management

The financial management of grant funds shall be in compliance with all applicable Federal, State, local, and grantor rules, regulations, and assurances as well as Cooperative policies and administrative guidelines.

The Cooperative shall provide for the following:

- A. Identification, in Cooperative accounts, of all grant awards received and expended and the programs under which they were received. For Federal programs and awards, identification shall include the Catalog of Federal Domestic Assistance (CFDA) title and number, Federal award identification number and year, name of the Federal agency and name of the pass-through entity, as applicable.
- B. Accurate, current, and complete disclosure of the financial results of each Federal award or program in accordance with the reporting requirements of the grant.
- C. Records that identify adequately the source and application of funds provided for Federally-funded activities. These records must contain information pertaining to Federal awards, authorizations, obligations, unobligated balances, assets, expenditures, income and interest and be supported by source documentation.
- D. Effective control over, and accountability for, all funds, property, and other assets. The Cooperative must adequately safeguard all assets and assure that they are used solely for authorized purposes.

Further, the Cooperative must:

- 1. establish and maintain effective internal control over the Federal award that provides reasonable assurance that the Cooperative is managing the Federal award in compliance with Federal statutes, regulations, and the terms and conditions of the Federal award;
 - 2. comply with Federal statutes, regulations and the terms and conditions of the Federal award;
 - 3. evaluate and monitor the Cooperative's compliance with statutes, regulations and the terms and conditions of the Federal award;
 - 4. take prompt action when instances of noncompliance are identified including noncompliance identified in audit findings;
 - 5. take reasonable measures to safeguard protected personally identifiable information and other information the Federal awarding agency or pass-through entity designates as sensitive consistent with applicable Federal, State, local, and tribal laws regarding privacy and obligations of confidentiality.
- E. Comparison of expenditures with budget amounts for each Federal award.
- F. Recordkeeping and written procedures to the extent required by Federal, State, local, and grantor rules and regulations pertaining to the grant award and accountability, including, but not limited to, the following areas:
 - 1. cash management
 - 2. allowability

3. conflict of interest
4. procurement
5. equipment management
6. conducting technical evaluations of proposals and selecting recipients
7. compensation and fringe benefits
8. travel

G. Disclosure of any potential conflict of interest and all mandatory violation disclosures potentially affecting the Federal award/grant to the Federal awarding agency or pass through agency in accordance with applicable Federal policy.

H. Insurance coverage for real property and equipment, if applicable, equivalent to such property owned by the Cooperative.

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Legal

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Compliance Supplement for Single Audits of State and Local Governments 20 U.S.C. 7906

Education Department General Administrative Regulations (EDGAR)