



RISE CHARTER SCHOOL

Policy 7235: Fiscal Accountability and IDEA Part B Funds and Federal Grant Funds Status: ADOPTED

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Fiscal Accountability and IDEA Part B Funds

RISE Charter School must ensure fiscal accountability at each phase in the use of Individuals with Disabilities Education Act (IDEA) Part B **and Elementary and Secondary Education Act (ESEA)** funds. The purpose of this policy is to ensure that the RISE Charter School complies with the State Department of Education requirements described in the Idaho State Department of Education IDEA Funding Manual.

Use of IDEA Part B Funds

The RISE Charter School shall use IDEA funds only to pay excess costs of providing special education and related services to children with disabilities. A cost is determined to be an excess cost of providing special education only if it meets each of the following criteria:

1. The cost would not exist in the absence of special education needs;
2. The cost is not also generated by students without disabilities; and
3. If the cost is specific to a particular child **there is documentation of whether it is** ~~documented~~ if that child is on an Individual Education Plan (IEP).

The Board directs the Executive Director or designee to establish procedures and internal controls to ensure that IDEA Part B funds are used only for allowable, excess costs of providing special education and that these costs are accounted for in the proper function/program codes described in 34 CFR 300.202-205. These procedures and controls shall also ensure the accuracy of the RISE Charter School's Excess Cost Calculation, as required by 34 C.F.R. 300.16 and Appendix A to 34 C.F.R.300.

The ~~S~~special Eeducation ~~D~~director and the ~~B~~business ~~M~~anager approve all IDEA Part B expenditures (**purchase orders** ~~P~~~~O~~, invoices) following the process described in the written procedures for determining allowability of cost (cost principles).

Use of ESEA Funds

The School shall use ESEA funds only to pay for items of cost that meet the standards of 2 CFR 200.403-405 for allowability, reasonableness, and necessity. Additionally, expenses with funding for each program must be closely aligned with the program's goals.

Time and Effort Reporting

Charges to federal awards for salaries and wages must be based on records that accurately reflect the work performed. In order to determine if personnel costs are allowable under IDEA Part B or ESEA, the RISE Charter School shall maintain auditable "time and effort" documentation that shows how each employee paid with any IDEA Part B funds or ESEA program funds spent their spent his or her compensated time. Such work shall be documented on the time and effort forms. The form shall be kept for employees paid in full or in part with federal funds or whose salary is used to meet a matching requirement in a federal program. Such documents are written reports of the distribution of an employee's time between cost objectives to align the distribution of employee costs with allowable activities for applicable federal programs. how the time was spent.

The Board directs the Executive Director or designee to establish a system for time and effort reporting that complies with the requirements of CFR 200.430(g) ~~OMB Circular A-87 and OMB Circular A-133~~ and with the 7235P 4235P Written Compensation Procedure.

Maintenance of Effort Under IDEA Part B

In order to ensure that the requirement of Maintenance of Effort is met, the Board directs the Executive Director or designee to establish a means of tracking and reporting local expenditures separate from the expenditure of State funds. This is to be done for the purpose of verifying that local funds are used for special education expenditures.

Property Procurement and Tracking

The Board directs the Executive Director or designee to establish written procedures to ensure that the RISE Charter School's mechanism for procurements using IDEA Part B funds conforms to the standards outlined in 34 C.F.R. 80.36 and with Policy 7400 Miscellaneous Procurement Standards and any related procedures. The Board also directs the Executive Director or designee to establish a system to maintain adequate inventory management of property purchased with IDEA Part B or ESEA grant funds.

Property records in the inventory management system should include, at a minimum:

1. Property description;
2. Identification number;
3. Source of funding (including the federal award identification number);

4. **The title holder;**
5. Acquisition date and cost;
6. **The percentage of the federal agency contribution towards the original purchase;**
7. The location, use, and condition of the property; and
8. Any ultimate disposition data including the date of disposal and sale price of the property.

In addition to the above information, the inventory management system should ensure that all source documents in support of the above information are maintained throughout the life and disposition of the equipment. These records should be updated frequently so that every piece of equipment purchased with federal funds can be accounted for at any given time.

Appeal of Claims of Noncompliance

If a federal agency finds the School has not complied with the requirements of a federal grant, and the Board disagrees with the finding, the Board may direct the Executive Director to object to or appeal the remedy the federal agency seeks to impose, as described in 2 CFR 200.342.

Cross Reference:

7400 Miscellaneous Procurement Standards

7400 – P(1) Miscellaneous Procurement Standards – Federal Award Requirements

7400 – P(2) Miscellaneous Procurement Standards – Procurement Methods Under a Federal Award

7400 – P(3) Miscellaneous Procurement Standards

7400 – P(4) Miscellaneous Procurement Standards – General Procurement Standards for Federal Awards

Legal Reference:

2 C.F.R. § 200.430 Compensation - Personal Services

34 C.F.R. Subpart B, Subgroup 43 Children with Disabilities Enrolled by Their Parents in Private Schools

34 C.F.R. § 300.16 Excess Costs

34 C.F.R. § 300.202 Use of Amounts

34 C.F.R. § 300.203 Maintenance of Effort

34 C.F.R. § 300.204 Exception to Maintenance of Effort

34 C.F.R. § 300.205 Adjustment to Local Fiscal Efforts in Certain Fiscal Years

34 C.F.R. Appendix A to Part 300 Excess Costs Calculation

Fiscal Accountability Checklist: For Sub-Recipients of IDEA Part B Funds

OMB Circular A-87 Cost Principles for State, Local, and Indian Tribal Governments

OMB Circular A-133 Audits of States, Local Governments, and Non-Profit Organizations

Other Reference:

Idaho State Department of Education, IDEA Part B Funding Manual (Rev. Jan 25, 2018)
(available at: <https://www.sde.idaho.gov/sped/funding/files/application/resource/IDEA-P...>)
(last accessed Dec. 3, 2019).

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