



Financial Policies and Procedures

Board Power and Duties:

Financial resources: The Board is responsible for adopting a budget that will provide the financial basis for buildings, staff, materials and equipment which will enable the school to carry out the educational program. The Board is responsible for exercising control over the finances of the school to insure proper use of, and accounting for, all school funds

Annual Budget:

The annual budget is the financial plan for the operation of the school. The annual operating budget will be based on a fiscal year which shall be from July 1 to June 30. It provides the framework for both expenditures and revenues for the year and future years and translates into financial terms the educational programs and objectives of the school.

The Head of School or designee is directed to develop, subject to annual approval by the Board, a three-year budget plan that assures the future financial viability of the school and achievement of the school's objectives and considers future revenue, including tax and non-tax revenue, and future increases in operating expenses.

Budget Process:

The school accountability committee shall recommend to the Head of School its school priorities for spending school moneys. The Head of School shall consider the school accountability committee's recommendations regarding spending state, federal, local, or private grants and any other discretionary moneys and take them into account in formulating the proposed budget for presentation to the local school board.

The school accountability committee shall include the adopted plan (school performance plan, school improvement plan, school priority improvement plan, or

school turnaround plan as is required) in the compilation prepared pursuant to section 22-11-302 (1), and the school board shall consider such adopted plan in developing the budget required by section C.R.S. 22-44-108. C.R.S 22-11-403, 404, 405, & 406.

In addition to the annual budget, the Head of School or designee shall prepare and maintain a multi-year financial forecast projecting revenues, expenditures, enrollment, and fund balances for at least three subsequent fiscal years. This forecast will be presented to the Board annually alongside the proposed budget and used to inform long-term planning, sustainability, and financial decision-making.

The annual budget shall align with and support the priorities identified in the school's Unified Improvement Plan (UIP). Budget development will explicitly reference UIP goals to ensure that financial resources are directed toward academic improvement, equity, and program sustainability.

The budget shall be developed and presented in accordance with all applicable state statutes and The Colorado Department of Education [Financial Policies and Procedures Handbook](#)

The budget format shall itemize expenditures of the school by fund and show the amount budgeted for the current fiscal year and the amount budgeted for the ensuing fiscal year.

The budget also shall disclose planned compliance with spending limitations outlined in Article X, Section 20, of the Colorado constitution, including holding TABOR reserve funds in an unrestricted general fund or in designated cash funds.

Legal

C.R.S. 22-44-101 through 22-44-119

C.R.S. 22-44-105 (1)(c.5)

C.R.S. 22-44-204 (3)

C.R.S. 22-44-301

Fiscal Accounting, Reporting and Inventories

The Head of School or their contracted designee shall be responsible for receiving and properly accounting for all funds of the school.

All funds received and/or disbursed by school shall be accounted for carefully and accurately; and shall conform to generally accepted principles of governmental accounting.

The "Financial Policies and Procedures Handbook" adopted by the State Board of Education shall be used to report financial records and in the periodic presentation of financial information to the school board.

The accounting system utilized shall conform to the requirements of the State Board of Education standards providing for the appropriate separation of accounts, funds, and operational duties. Fiscal accounting must meet requirements established by the State Board of Education as set forth in the Financial Policies and Procedures Handbook for public schools in Colorado.

The school shall maintain a system for an annual inventory of all tangible real and personal property that meets any of the following criteria:

1. A useful life longer than one year and a unit cost or donated value that equals or exceeds \$5,000.
2. All technology equipment items with a life longer than one year and a unit cost or donated value that equals or exceeds \$5,000.
3. Purchased with federal funds, regardless of the unit cost.

Responsibility for the inventory system shall lie with the Head of School or their designee.

Legal

C.R.S. 22 45

C.R.S. 29-1-506

C.R.S. 22-44-203

C.R.S. 22-44-204 (3)

C.R.S. 22-45-102

Audits/Financial Monitoring

In accordance with state law, all funds and accounts of the school shall be audited annually, following the close of the fiscal year.

The Board shall appoint an independent auditor licensed to practice in Colorado and knowledgeable in government accounting to conduct the audit.

The audit report shall contain the following:

1. Financial statements prepared insofar as possible in conformity with generally accepted governmental accounting principles. (The financial statements are the representation of the school whether prepared by the school or by the auditor.)
2. Disclosures in accordance with The "Financial Policies and Procedures Handbook" adopted by the State Board of Education
3. All funds and financial activities of the school
4. A budget to actual comparison for each fund and activity
5. The auditor's opinion on the financial statements. If the opinion is anything other than unqualified, the reason must be explained.
6. Disclosure of all instances of noncompliance with state law, including the Public School Finance Act of 1988, irrespective of materiality.
7. A supplemental listing of all investments held by the school at the date of the financial statement.

The auditor also shall make recommendations to the Board concerning its accounting records, procedures and related activities as may appear necessary or desirable and shall perform such other related services as may be requested by the Board.

A draft audit report must be completed by September 30, and a final audit report must be completed by October 15. The Board reserves the right to request an audit at more frequent intervals if desired. To maintain independence and objectivity, the Board shall undergo a formal auditor selection process at least once every five years, even if it elects to continue with the same auditing firm.

Legal

C.R.S. 22 32 109 (1)(k)

C.R.S. 24 75 601.3

C.R.S. 29 1 601 et seq.

Interim Financial Reporting:

The Head of School or their designee shall provide to the board a report detailing the financial condition of the school at least quarterly during the fiscal year. The quarterly financial report shall include at a minimum:

1. The actual amounts spent and received as of the date of the report from each of the funds budgeted by the school for the fiscal year, expressed as dollar amounts and as percentages of the annual budget;
2. The actual amounts spent and received for each fund for the same period in the preceding fiscal year, expressed as dollar amounts and as percentages of the annual budget;
3. The expected year-end fund balances, expressed as dollar amounts and as percentages of the annual budget; and
4. A comparison of the expected year-end fund balances with the amount budgeted for that fiscal year
5. A year-to-date balance sheet for the school's Governmental Funds

Once per month, the Head of School or their designee shall provide these reports to the Board Finance Committee.

Banking Services Deposit of Funds, Authorized Signatures and Check Writing

All revenue received by the school shall be deposited in an official bank or banks or savings and loan institutions as designated by the Board. Such financial institution must qualify as an eligible public depository in accordance with state law.

All moneys belonging to the school including moneys derived from food services and school activities shall be deposited by the treasurer of the Board or official custodian to the credit of the school in a depository designated by the Board.

The treasurer or official custodian shall comply with all requirements of state law regarding the deposit of public school funds.

All checks drawn on the school funds shall require the signature, or electronic approval, of the Head of School up to \$5,000 and over \$5,000 a second signature/electronic approval from the treasurer of the Board.

Legal

C.R.S. 11-10.5-101 et seq. (relates to deposits of public funds in banks)

C.R.S. 11-47-101 et seq. (relates to deposits of public funds in savings and loan institutions)

C.R.S. 22-32-104 (4)(c)

C.R.S. 22-32-107 (3),(4),(6)

C.R.S. 22-32-109 (1)(g)

C.R.S. 22-32-110 (1)(x)

C.R.S. 22-40-105

C.R.S. 22-45-104 (relates to collection and deposit of fees and fines)

Fund Disbursement

All disbursements of school funds shall be made in accordance with board policy, sound internal controls, and applicable state and federal requirements. The purpose of this policy is to establish clear authority, approval thresholds, and procedures to safeguard school resources and ensure accountability.

Approval and Signatory Thresholds

- Up to \$500: Lead Teacher
- \$501–\$5,000: Head of School
- Greater than \$5,000 up to \$50,000: Head of School and Board Treasurer
- Greater than \$50,000: must be approved by the Board of Education and executed by the designee

Authorized Positions

- Check Signers: Head of School, Board Treasurer, Board President
- Procurement or Debit Card Holders: Head of School, Business Manager (with limits established by procedure)
- Bank Account Access: Head of School, Board Treasurer, Board President

Transaction Exemptions

Recurring payments such as rent, payroll, employee benefits, utilities, and debt service may be processed without individual approvals at each occurrence, provided they are consistent with board-adopted budgets and approved contracts. Emergency disbursements may be authorized by the Head of School, with notification provided to the Board Treasurer at the next regular board meeting.

Authorized Signers on Accounts

- At least one active board member shall be designated as an authorized signer on all school bank accounts.
- A minimum of three authorized signers shall be maintained on all accounts to ensure continuity and oversight.

Internal Controls

No individual with authority to approve disbursements shall simultaneously be responsible for bank reconciliations or accounting records. Segregation of duties shall be maintained to the greatest extent practicable to safeguard against misuse of funds.

Payroll

The School Leader shall develop and implement payroll procedures, subject to review by the Finance Committee, to ensure accurate and timely compensation of all employees in accordance with board policy, state requirements, and contractual agreements.

Authorization of Pay Amounts

All employee pay amounts shall be approved in writing at the time of hire and prior to the issuance of the first paycheck. Pay authorizations shall include salary or hourly wage, benefits, and any additional stipends as approved by the Board. Any subsequent changes to

compensation must be documented in writing and approved by the School Leader, with Board approval when required.

Payroll procedures shall include, at a minimum:

- Pay Frequency: Employees shall be paid on a bi-weekly/semi-monthly schedule, as determined annually and communicated in advance.
- Time and Effort Reporting: Employees whose compensation is supported in whole or in part by federal funds shall complete required time and effort documentation in compliance with federal regulations.
- PERA Contributions: The school shall withhold and remit contributions to the Public Employees' Retirement Association (PERA) in accordance with state law.
- Benefit Processing: Authorized employee benefit deductions and employer contributions shall be processed with each payroll cycle, in compliance with board-approved benefit programs.

Documentation Requirements

- All pay approvals shall be documented in the employee's personnel file.
- Written authorization for pay shall be completed at the time of hire and updated when changes occur.
- Payroll records shall be retained in accordance with the Records Retention Policy and applicable state and federal requirements.

Establishment of Procurement Card Purchases

The school is authorized to establish a procurement card to supplement the ordering of supplies of a nominal value. The purpose of the procurement card is to provide flexibility, convenience and security with small purchases while conducting school business.

Purchase transactions using the procurement card shall not supersede or conflict with the purchasing policies that have been established by the Board.

The School shall establish procedures for the usage of procurement cards.

A number of unique controls shall be developed for the procurement card program that do not exist in a traditional credit card environment. Usage shall be limited by transaction amount and total monthly expenditure amount. The type of merchandise allowed for purchase, restrictions of persons authorized to receive the cards, and other procedures may be set at the determination of the Head of School or their designee.

Procurement:

No person shall be authorized to commit the school to a purchase contract or purchase unless expressly authorized by the Head of School or their designee. Only authorized representatives of the school will issue a purchase order number, obligate the school for purchase of goods and services, and revise or cancel a purchase order.

Except in case of an emergency, purchases shall be handled as follows:

- A purchase for goods and services up to \$9,999 may be made through direct check, procurement card, or by purchase order. While competitive quotes may be obtained, they are not required.
- A purchase for goods and services between \$10,000 and \$249,999 requires an informal written competitive bid from a minimum of two qualified sources.
- A purchase for goods and services \$250,000 and above requires a formal RFP process to solicit competitive bids. Before the purchase award is granted, approval by the board of education must be given.

Procedures shall be established which assure that purchases are appropriate and that funds are available before purchases are authorized.

For purchases made with federal funds, the school shall follow the procurement thresholds and requirements established under 2 CFR Part 200. These thresholds may differ from non-federal procurement thresholds outlined above. When federal funds are used, documentation must reflect compliance with federal standards for micro-purchases, small purchases, competitive proposals, and sole-source procurements.

Other exceptions may be made by the Head of School in cases of emergencies, which shall be reported to the Board no later than its next regular meeting.

When making purchases, consideration will be given to the price and such other factors as the school at its sole discretion deems to be appropriate, including without limitation, the reliability and responsibility of vendors, timely delivery, extent of warranties offered, and quality of materials or services proposed to be used.

Budgetary Expenditure Authorization

Expenditures from any school fund must be approved or authorized in accordance with all board policies and require the following signatures (which may be electronic or hard copy) to be effective as expenditures against budget:

1. Up to \$500: Lead Teacher
2. Between \$500 and \$5,000: Head of School
3. Greater than \$5,000 up to \$150,000: Head of School and Board Treasurer
4. Greater than \$150,000 up to and including \$500,000: must be approved by the Board of Education and executed by the designee.

Unauthorized Purchases

Purchases that do not comply with the provisions of this policy are unauthorized purchases. The school is not liable for payment of any unauthorized purchases. Individuals who make unauthorized purchases may be held personally responsible for payment.

Contracts

Any written contract shall include a provision requiring a criminal background check for any person providing direct services to students under the contract, including subcontractors or agents, as required by law. Background checks are only required for persons who have regular, not incidental, contact with students at least once a month. The school reserves the right to require criminal background checks on other contracts at its discretion. Contractors shall be responsible for any costs associated with required background checks.

Contracts documenting purchases made with federal funds shall contain all provisions mandated by the Federal Uniform Grant Guidance (UGG).

Authorization to Sign Contracts

- The Head of School is authorized to sign contracts up to \$25,000.
- Contracts valued over \$25,000 and up to \$150,000 must be signed by the Head of School and approved by the Board Treasurer.
- Contracts valued over \$150,000 must be approved by the Board of Education and executed by the Board President or a designated officer.

Contract Term Limitations

To safeguard financial flexibility, no contract shall exceed a term of five (5) years, inclusive of any renewals or extensions, unless specifically approved by the Board.

Legal:

2 CFR 200.318–200.326

C.R.S. 24-18-201

C.R.S. 22-32-109 (1)(b)

C.R.S. 22-32-122

Equipment Control and Disposition (federal funds)

Equipment shall be used in the program or project for which it was acquired as long as needed, whether or not the project or program continues to be supported by Federal funds. When no longer needed for the original program or project, the equipment may be used in other activities currently or previously supported by a Federal agency.

The school shall also make equipment available for use on other projects or programs currently or previously supported by the Federal Government, providing such use will not interfere with the work on the projects or program for which it was originally acquired. First preference for other use shall be given to other programs or projects supported by the awarding agency.

When acquiring replacement equipment, the school may use the equipment to be replaced as a trade-in or sell the property and use the proceeds to offset the cost of the replacement property, subject to the approval of the awarding agency.

Procedures for managing equipment (including replacement equipment), whether acquired in whole or in part with grant funds, until disposition takes place will, shall be established and meet the requirements mandated by the [Federal Uniform Grant Guidance](#) (UGG).

All equipment exceeding the capitalization threshold, as well as items considered highly portable or attractive (e.g., laptops, tablets, cameras), shall be tracked in the school's centralized inventory system. Such assets shall be stored securely in locked rooms or restricted access areas when not in use.

All federally purchased equipment shall be affixed with a unique asset tag that includes the grant year and funding source.

Conflict of Interest

In carrying out their fiduciary duties, a board member or staff member shall not:

1. Use their positions for a private advantage or personal financial or material gain.
2. Accept a gift of substantial value (or a substantial economic benefit which is the same as a gift of substantial value) which would tend to improperly influence a reasonable person in their position or which he or she knows or should know is primarily for the purpose of rewarding them for official action taken.
3. Engage in a substantial financial transaction for their private business purposes with a person whom they supervise in the course of their official duties.
4. Perform an official act which directly and substantially confers an economic benefit on a business or other undertaking in which he or she has a substantial financial interest or in which he or she is engaged as a counsel, consultant, representative or agent.
5. Participate directly or indirectly in the purchasing process if the employee has a direct relationship with a vendor doing business with the school.
 - a. A direct relationship may include:
 - i. The business being owned by a spouse or immediate family member or the employee being employed by the business
 1. Immediate family members include spouse, child, step-child, parents, siblings, in-laws, grandparents, grandchildren or relative living in the household of the employee.
 - b. Direct or indirect participation means involvement through decisions, approval, disapproval, recommendation, preparation of any part of a purchase request, influencing the content of any specifications or procurement standard, rendering of advice, investigation, auditing or acting in any other advisory capacity.

The school shall not purchase goods or services from a business owned by an immediate family member of a board member or employee, unless the goods or services are procured through a competitive process by and determined to be in the school's best interest.

A conflict of interest includes not only actual conflicts but also situations in which a board member's or staff member's actions may create the appearance of a conflict, even if no actual conflict exists. Board members and staff shall avoid both actual and perceived conflicts of interest.

ETHICAL PRINCIPLES

The following ethical principles for board members “are intended as guides to conduct and do not constitute violations as such of the public trust of office . . .” These principles provide that a board member should not:

1. Acquire or hold an interest in any business or undertaking which he or she has reason to believe may be directly and substantially benefited by official action to be taken by the school.
2. Within six months following the termination of their position, obtain employment in which they will take direct advantage, unavailable to others, of matters with which they were directly involved during their term of office.
3. Perform an official act directly and substantially affecting a business or other undertaking to its economic detriment when they have a substantial financial interest in a competing firm or undertaking.

Board members and staff are prohibited from accepting gifts or other items of value in excess of the limit set by the Colorado Independent Ethics Commission. Violations of ethics laws or this policy may result in disciplinary action, up to and including dismissal from employment or removal from the board, as permitted by law.

DISCLOSURE REQUIREMENTS

A board or staff member, who has personal or private interest in any matter, proposed or pending before the board shall disclose such interest to the board, shall not vote on the matter and shall refrain from attempting to influence the decisions of other members of the board.

A board member may vote if their participation is necessary to obtain a quorum or otherwise enable the board to act and if disclosure has been made to the secretary of state giving the information required by statute. The written disclosure to the secretary of state must include:

- (1) the amount of their financial interest,
- (2) the purposes and duration of services rendered,
- (3) the compensation received, and
- (4) any other information to describe the interest.

If the board member votes on the matter, the member should make a public disclosure on the record at the time of voting.

Legal

C.R.S. 24-18-104

C.R.S. 24-18-105

C.R.S. 24-18-109(3)

C.R.S. 24-18-110

C.R.S. 24-18-201

2 CFR 200.318-200.326

Borrowing

When it becomes evident early in the fiscal year before substantial tax moneys have been received that the cash balances will not meet anticipated obligations, the School Board shall negotiate, under the provisions of Colorado statutes, for short term debt in such amounts as may be required to meet such obligations.

The Board may authorize the president and the treasurer to execute promissory notes on behalf of the school from time to time as such borrowing of funds becomes necessary and may further authorize them to execute any and all other documents necessary or incidental to the borrowing of funds.

By law, these short-term loans are liquidated within six months of the close of the fiscal year from moneys received by the school for the general fund. The school is legally prohibited from entering into multi-year debt obligations.

- a. Short-term options may include such debt instruments as line of credit when necessary or prudent to allow the school to meet its cash flow requirements.
- b. Equipment Financing: Lease obligations are a routine and appropriate means of financing capital equipment. However, lease obligations also have a significant impact on budget flexibility. Therefore, efforts will be made to fund capital equipment with pay-as-you go financing where feasible, and only the highest priority equipment purchases will be funded with lease obligations.

Credit Cards

The use of school credit cards is permitted for official business only. Credit cards shall be issued in the name of the school, with an aggregate credit limit not to exceed **\$10,000** unless otherwise approved by the Board. Usage shall be restricted to designated staff, and itemized receipts must be submitted for all charges. Personal use of school credit cards is strictly prohibited.

Legal

C.R.S. 22-40-107

Records Retention

The school shall use of the [Colorado School District Records Management Manual](#) (records management manual) developed by the Colorado State Archives Department to assist the school in determining the appropriate retention period for various types of records. School records regarding the school's organization, functions, policies, decisions, procedures, operations, or other activities may be considered public records subject to retention.

The school shall retain records for the time periods specified by the records management manual, as may be amended from time to time, unless a longer retention period is required by state or federal law.

Documents and other materials that are not "records" required to be retained by the records management manual, or state or federal law, and are not necessary to the functioning of the school, may be destroyed when no longer needed.

Official records may be maintained in either physical or secure digital format, provided that access is restricted to authorized personnel. The storage location of all official records shall be documented and reviewed annually.

Upon expiration of the required retention period, records shall be disposed of securely. Paper records must be shredded or otherwise destroyed to render them unreadable. Digital records must be permanently deleted using secure erasure methods.

Legal:

C.R.S. 24-72-113 (limit on retention of passive surveillance records)

C.R.S. 24-80-101 et seq. (State Archives and Public Records Act)

Travel

Each school employee and official who is authorized to travel for school business assumes a direct responsibility to limit travel claims to those actually incurred while traveling and representing the school. Likewise, each school official and employee has a responsibility to limit travel to purposes that are essential. Arrangements utilizing the most economical means of accomplishing the authorized travel must be considered. This planning should include consideration of the use of personal car or common carrier, sharing rides with other employees attending the same event, and similar alternatives if appropriate.

Lodging:

The school will pay for the actual cost of employee lodging for travel that occurs more than 50 miles from the school. Every effort will be made to secure lodging that is no more than 110% of the GSA per diem lodging rates for the destination. For lodging per diem rates see <https://www.gsa.gov/travel/plan-book/per-diem-rates>.

Meals

The school will use the actual cost method, reimbursable with a detailed receipt.

If a meal is included in the conference fee or is provided with the cost of lodging, a traveler shall not request reimbursement.

Mileage for Personal Vehicles

Reimbursement is allowed for actual business mileage traveled. Mileage will be reimbursed using the IRS standard mileage rate at: <https://www.irs.gov/tax-professionals/standard-mileage-rates>. Commuting expenses incurred while traveling between a traveler's residence and traveler's regular work location are non-reimbursable personal expenses.

Other Allowable / Reimbursable Travel Expenses

In addition to meals and lodging, the actual expenses identified below, incurred as a part of approved travel, are allowable if necessary to complete school business. A traveler requesting reimbursement shall submit original receipts for all reimbursable expenses.

- 1) Commercial transportation such as airfare, taxi and shuttle expenses, including tips.
- 2) Parking fees.
- 4) Telephone, fax, internet, and other similar miscellaneous business expenses paid for school business.
- 5) Toll road charges.

Non-Allowable Travel Expenses

A Traveler shall not be reimbursed for the following expenses:

- 1) Alcoholic beverages;
- 2) Entertainment expenses;
- 3) Personal expenses incurred during travel that are primarily for the benefit of the traveler and not directly related to school business (Examples include the purchase of personal items such as soap or toothpaste, magazines, snacks, movie rentals and other miscellaneous items);
- 4) Political expenses;
- 6) The cost of traffic fines and traffic tickets; and
- 7) Personal telephone calls;
- 8) Valet parking.

Travel Authorization

All staff travel requests must be submitted to and approved by the School Leader prior to incurring expenses. The School Leader is responsible for ensuring compliance with reimbursement procedures.

Travel requests submitted by employees who report directly to the Board shall be approved by the Board Chair.

Micro-Purchases

The school shall follow federal procurement standards incorporated under Colorado law for micro-purchases. Micro-purchases are defined as acquisitions of supplies or services using simplified acquisition procedures, the aggregate dollar amount of which does not exceed the federal micro-purchase threshold, currently set at \$10,000 unless otherwise amended.

To the extent practicable, the school shall distribute micro-purchases equitably among qualified suppliers. Micro-purchases may be awarded without soliciting competitive quotations if the school determines the price to be reasonable.

The Head of School or designee shall ensure documentation of price reasonableness and compliance with all applicable procurement requirements. These procedures promote efficiency while maintaining fiscal accountability for small-scale purchases.

Legal:

C.R.S. 24-109-105 (Small purchases; micro-purchase procedures)

C.R.S. 24-109-104 (Procurement standards; incorporation of federal rules)

Federal Fund Management

The school shall comply with all applicable federal requirements, including the Uniform Grant Guidance (2 CFR Part 200), EDGAR, and supplement-not-supplant provisions.

Roles and Responsibilities

- Head of School: Oversees programmatic compliance and ensures funds are aligned with instructional priorities.
- Business Manager/Finance Staff: Responsible for financial management, drawdowns, recordkeeping, and vendor verification.
- Administrative Staff: Maintain supporting documentation, time/effort reports, and federal asset inventories.
- Board Finance Committee: Provides oversight of compliance and reviews interim reports.

Documentation of Costs

All federal expenditures must meet the tests of allowability, allocability, and reasonableness. Supporting documentation (e.g., receipts, contracts, time and effort certifications) shall be collected, securely stored, and retained in accordance with federal record retention requirements.

Drawdowns and Cash Management

Federal fund drawdowns will be requested on a reimbursement basis and limited to immediate cash needs. Duties will be segregated such that preparation, approval, and submission of drawdowns are performed by separate staff whenever practicable.

Vendor Verification

Prior to entering into contracts paid with federal funds, the school shall verify vendors are not suspended or debarred by conducting SAM.gov checks.

Asset Tracking

All federally purchased equipment will be assigned a unique asset tag with a serial number, grant year, and funding source. The Head of School shall maintain a centralized inventory system to prevent loss or theft.

Construction Projects

For federally funded construction projects, the school shall comply with Davis-Bacon prevailing wage requirements, procurement standards, and federal oversight procedures.

Equipment Disposal

Procedures for disposal or transfer of federally purchased equipment shall follow UGG requirements and be documented with the awarding agency.

Staff Time and Effort

Staff compensated with federal funds must provide:

- Semi-annual certifications (for staff working solely on one program).
- Personnel Activity Reports (PARs) when staff split time across programs.
- Payroll reconciliations aligned with time and effort reports.

Annual Compliance Review and Training

The Head of School shall conduct an annual internal review of federal grant compliance and provide annual staff training on federal fund requirements, including time and effort reporting.

Legal:

2 CFR Part 200 (Uniform Grant Guidance)

EDGAR