

POLICY TITLE: FEDERAL FUNDS

The Canyon-Owyhee School Services Agency (COSSA) Board of Trustees assures that it will comply with all Federal statues, regulations, program terms, and conditions of the Federal fiscal award. In addition, the COSSA Board of Trustees assures that it will comply with all applicable provisions of 34 C.F.R. Part 76. Federal funds will be used in accordance with the Code of Federal Regulations 2 C.F.R. Part 200, Subpart D, Post Federal Award Requirements, and Subpart E, Cost Principles and Education Department General Administrative Regulations (EDGAR) as applicable.

These policies and procedures will remain on file and available for inspection at the COSSA District Office.

Fiscal Accountability and IDEA Part B Funds

The **Agency** must ensure fiscal accountability at each phase in the use of Individuals with Disabilities Education Act (IDEA) Part B funds. The purpose of this policy is to ensure that the **Agency** 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 **Agency** 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, it is documented if that child is on an Individual Education Plan (IEP).

The Board directs the Superintendent 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 District's Excess Cost Calculation, as required by 34 C.F.R. 300.16 and Appendix A to 34 C.F.R.300.

The Special Education Director and the Business Manager approve all IDEA Part B expenditures (PO, invoices) following the process described in the written procedures for determining allowability of cost (cost principles).

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, the District shall maintain auditable "time and effort" documentation that shows how each employee paid with IDEA Part B funds 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 how the time was spent.

The Board directs the Superintendent to establish a system for time and effort reporting that complies with the requirements of OMB Circular A-87 and OMB Circular A-133 and with the 4235P Written Compensation Procedure.

Parentally-Placed Private School Children

The **Agency** must ensure that it is providing the appropriate portion of IDEA Part B funds to children receiving special education at private schools within the boundaries of the District. To accomplish this, the Board directs the Superintendent to establish procedures to accurately track and report expenditures for services provided to parentally-placed private school children.

The Special Education Director and the Business manager keep accurate records of all expenditures charged to the parentally-placed private school children budget. The documentation should be traceable to the financial report and available for inspection if requested.

Property Procurement and Tracking

The Board directs the Superintendent to establish written procedures to ensure that the **Agency'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 Procurement Management System and any related procedures. The Board also directs the Superintendent to establish a system to maintain adequate inventory management of property purchased with IDEA Part B funds.

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

1. Property description;
2. Identification number;
3. Source of funding;
4. Acquisition date and cost;
5. The location, use, and condition of the property; and
6. 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.

LEGAL REFERENCE:

2 C.F.R. §§200.430 Time and Effort
34 C.F.R. §§80.36 Procurement
34 C.F.R. §§80.42 Retention and Access Requirements for Records
34 C.F.R. §§300.132-133 Provision of Services for Parentally-Placed Private
School Children with Disabilities
34 C.F.R. §§300.16 Excess Costs
34 C.F.R. §§300.202-205 Use of Amounts
34 C.F.R. §§300, Appendix A Excess Costs Calculation
Fiscal Accountability Checklist: For Sub-Recipients of IDEA Part B Funds
OMB Circular A-87
OMB Circular A-133
Policies and Procedures Used Template, Idaho State Department of Education,
<http://www.sde.idaho.gov/sped/funding/>

POLICY HISTORY:

Adopted: 10-15-2018
Originally issued as Policy 508. Revised and reissued as Policy 7238 on January
19, 2022.