



Kenowa Hills Public Schools
Education inspired.

**FEDERAL FINANCIAL INTERNAL
CONTROLS AND PROCEDURES**

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FEDERAL FINANCIAL INTERNAL CONTROLS AND PROCEDURES

As a precondition to receive Federal funds, prospective recipients must have effective administrative and financial internal controls. As described in *34 CFR Part 80*, *2 CFR Part 215* and *Office of Management and Budget (“OMB”) Circular A-133 Compliance Supplement Part 6*, school districts must have written procedures for certain components of grant administration. This handbook itemizes **Kenowa Hills Public Schools** (“District”) procedures for those components.

ACTIVITIES ALLOWED OR UNALLOWED and ALLOWABLE COSTS/COST PRINCIPLES

Control Objectives

To provide reasonable assurance that Federal awards are expended only for allowable activities and that the costs of goods and services charged to Federal awards are allowable and in accordance with the applicable cost principles.

Control Activities

- Accountability provided for charges and costs between Federal and non-Federal activities.
 - The Board of Education (“Board”) approved District-wide budget and the approved Federal grant application budgets are reviewed periodically by the Director of Finance and ESSA HR, Assistant Superintendent of Curriculum and Instructions, and Board.
- Process in place for timely updating of procedures for changes in activities allowed and cost principles.
 - The Director of Finance and ESSA HR reviews the *OMB Circular A-133 Compliance Supplement* (“Supplement”) on an annual basis by reviewing Part 4 of the Supplement for each of the grants that apply to the District for the respective year.
- Computations checked for accuracy.
 - The allowable costs are recorded in the appropriate general ledger accounts and the accounting software is designed to ensure balances are mathematically accurate.
- Supporting documentation compared to list of allowable and unallowable expenditures.
 - The Director of Finance and ESSA HR reviews all expenditures prior to being submitted for reimbursement by comparing to Part 4 of the Supplement.
- Adjustments to unallowable costs made where appropriate and follow-up action taken to determine the cause.
 - Upon determination of an unallowable cost, the Director of Finance and ESSA HR reclassifies the expenditure to an appropriate account, notifies the pass-thru agency, and discusses the purchase with the District Program Director to gain an understanding of the initial allowable use assessment.

- Adequate segregation of duties in review and authorization of costs.
 - The District Program Director approves the purchase by submitting a requisition to purchase to the Business Office, the Director of Finance and ESSA HR approves the requisition and converts the requisition to a purchase order, the Accounts Payable Specialist places the order through processing of the purchase order, and the Accounts Payable Specialist processes payment upon receipt of product or service and electronic receipting of said goods or services within the financial management system by the District Program Director after the goods have been received.
- Accountability for authorization is fixed in an individual who is knowledgeable of the requirements for determining activities allowed and allowable costs.
 - The Director of Finance and ESSA HR is the final authorization of reimbursement requests.

CASH MANAGEMENT

Control Objectives

To provide reasonable assurance that the (1) drawdown of Federal cash is only for immediate needs, (2) reimbursement is requested only after costs have been incurred, (3) States comply with applicable Treasury agreements, and (4) recipients limit payments to sub-recipients to immediate cash needs.

Control Activities

- Cash flow statements by program are prepared to determine essential cash flow needs.
 - Access to responsibility reports are provided through access of the financial management system to generate the reports and are reviewed on a monthly basis and reviewed by the applicable Program Director and Director of Finance and ESSA HR for a consistent level of service and timely requests for reimbursement of expenditures.
- Accounting system is capable of scheduling payments for accounts payable and requests for funds from Treasury to avoid time lapse between draw down of funds and actual disbursements of funds.
 - The District operates strictly on a reimbursement basis and accordingly there is no time lapse between draw down and disbursement.
- Appropriate level of supervisory review of cash management activities.
 - The Director of Finance and ESSA HR approves the reimbursement requests and the Board reviews payments of bills in conjunction with monthly financial statements.
- Written policy that provides:
 - Procedures for requesting cash advances as close as is administratively possible to actual cash outlays and reimbursement only after costs have been incurred and detailed invoices or receipts are provided;
 - Monitoring of cash management activities; and
 - Repayment of excess interest earnings where required.
 - The District operates on a reimbursement basis. The Director of Finance and ESSA HR and Board monitor cash activities on a monthly basis and there are no interest earnings to be considered for repayment.

DAVIS-BACON ACT

Control Objectives

To provide reasonable assurance that contractors and subcontractors were properly notified of the Davis-Bacon Act requirements and the required certified payrolls were submitted to the non-Federal entity.

Control Activities

- Contractors informed in the procurement documents of the requirements for prevailing wage rates.
 - The District includes necessary prevailing wage rate disclosure information in all bid documents for construction projects funded with Federal dollars.
- Contractors and subcontractors are required by contract to submit certifications and copies of payrolls.
 - The District includes necessary prevailing wage rate requirements in all bid documents for construction projects funded with Federal dollars.
- Contractors' and subcontractors' payrolls monitored to ensure certified payrolls are submitted.
 - The Director of Finance and ESSA HR requests certified payroll reports from contractors and subcontractors to verify that the reports are properly certified.

ELIGIBILITY

Control Objectives

To provide reasonable assurance that only eligible individuals and organizations receive assistance under Federal award programs, that sub-awards are made only to eligible sub-recipients, and that amounts provided to or on behalf of eligible individuals or groups of individuals were calculated in accordance with program requirements.

Control Activities

- Written policies provide direction for making and documenting eligibility determinations.
 - The Director of Finance and ESSA HR reviews the *OMB Circular A-133 Compliance Supplement* on an annual basis by reviewing Part 4 of the Supplement for each of the grants that apply to the District for the respective year. Eligibility requirements for each grant are considered and discussed with the Program Director to collectively design a plan to determine that only eligible individuals and organizations receive assistance under the Federal award programs. Eligibility determinations are documented on State and/or Federal forms when provided. When no forms are available, the District uses internally developed forms for documentation.
- Procedures to calculate eligibility amounts consistent with program requirements.

- The District does not have any grants where funds are given directly to individuals. The Director of Finance and ESSA HR reviews the *OMB Circular A-133 Compliance Supplement* on an annual basis by reviewing Part 4 of the Supplement for each of the grants that apply to the District for the respective year. Amounts are then determined on a building basis to provide services to the eligible recipients.
- Eligibility objectives and procedures clearly communicated to employees.
 - The Director of Finance and ESSA HR and applicable Program Director meets to review eligibility requirements for the various programs upon approval of the grants. The Program Director then communicates this information to appropriate support personnel to aid them in carrying out their program responsibilities.
- Authorized signatures (manual or electronic) on eligibility documents periodically reviewed.
 - Authorized signatures are included on eligibility documents provided by the State or Federal government when a signature line is included on the form.
- Adequate safeguards are in place to ensure access to eligibility records (manual or electronic) limited to appropriate persons.
 - Eligibility records are maintained in the Director of Finance and ESSA HR's office or the applicable building office with access limited to certain individuals.
- Manual criteria checklists or automated process used in making eligibility determinations.
 - The District uses documents, forms or templates provided by the State or Federal government when available. If no form is available, the District develops its own form for documentation of eligibility.
- Process for periodic eligibility re-determinations in accordance with program requirements.
 - Eligibility for program services is determined on an annual basis. However, the District reviews the *OMB Circular A-133 Compliance Supplement Part 4* for re-determination requirements as applicable for each of the grants that apply to the District for the respective year.
- Verification of accuracy of information used in eligibility determinations.
 - The District relies on *OMB Circular A-133 Compliance Supplement Part 4* to itemize requirements for determining eligibility. Accuracy of information is performed through independent third party verification. Such verification could include reviewing household paystubs, bank statements, utility bills, etc.
- Procedures to ensure the accuracy and completeness of data used to determine eligibility requirements.
 - The District relies on *OMB Circular A-133 Compliance Supplement Part 4* to itemize requirements for determining eligibility. Accuracy of information is performed through independent third party verification.
- Process in place to ensure benefits were discontinued when eligibility requirements no longer met or period of eligibility expired.
 - Eligibility for program services is determined on an annual basis. An individual is considered eligible for the entire program period of availability or the District's fiscal year, whichever is shorter. Accordingly, there is no discontinuation of benefits during this period.

EQUIPMENT AND REAL PROPERTY MANAGEMENT

Control Objectives

To provide reasonable assurance that proper records are maintained for equipment acquired with Federal awards, equipment is adequately safeguarded and maintained, disposition or encumbrance of any equipment or real property is in accordance with Federal requirements, and the Federal awarding agency is appropriately compensated for its share of any property sold or converted to non-Federal use.

Control Activities

- Accurate records maintained on all acquisitions and dispositions of property acquired with Federal awards.
 - The District Accountant maintains a detailed capital asset register with Federal and non-Federal asset purchases. Within the register is an identifier that indicates the funding source. This register is maintained on a perpetual basis.
- Property tags are placed on equipment.
 - Property tags are placed on equipment by District support staff, under the supervision of the Program Director, for assets purchased with Federal funding. These items can be traced back to the asset records through serial and/or model numbers in addition to the identified location of the asset.
- A physical inventory of equipment is periodically taken and compared to property records.
 - A physical inventory of equipment acquired under Federal awards is conducted at least once every two years. Any differences between the physical inventory and equipment records are resolved by the District Accountant.
- Property records contain description (including serial number or other identification number), source, who holds title, acquisition date and cost, percentage of Federal participation in the cost, location, condition, and disposition data.
 - The District Accountant maintains property records containing all the necessary information.
- Procedures established to ensure that the Federal awarding agency is appropriately reimbursed for dispositions of property acquired with Federal awards.
 - The Director of Finance and ESSA HR reviews dispositions of equipment acquired under Federal awards with a current per unit fair market value of \$5,000 or more to determine whether the awarding agency should be reimbursed for the appropriate Federal share. The Director of Finance and ESSA HR consults with the awarding agency to determine the appropriate course of action.
- Policies and procedures in place for responsibilities of recordkeeping and authorities for disposition.
 - The District Accountant maintains the capital asset register while the Director of Finance and ESSA HR reviews the register on an annual basis. The Director of Finance and ESSA HR authorizes capital asset dispositions prior to removal from the register.

MATCHING, LEVEL OF EFFORT, EARMARKING

Control Objectives

To provide reasonable assurance that matching, level of effort or earmarking requirements are met using only allowable funds or costs which are properly calculated and valued.

Control Activities

- Evidence obtained such as a certification from the donor, or other procedures performed to identify whether matching contributions:
 - Are from non-Federal sources;
 - Involve Federal funding, directly or indirectly; and
 - Were used for another Federally-assisted program.

Note: Generally, matching contributions must be from a non-Federal source and may not involve Federal funding or be used for another Federally assisted program.

 - The Director of Finance and ESSA HR reviews the *OMB Circular A-133 Compliance Supplement Part 4* on an annual basis noting grants that have matching contribution requirements. The District annual financial budgets are adopted including dollars needed to comply with matching contribution requirements for Federal grants.
- Adequate review of monthly cost reports and adjusting entries.
 - The Director of Finance and ESSA HR reviews responsibility reports for Federal grants on a monthly basis.

PERIOD OF AVAILABILITY OF FEDERAL FUNDS

Control Objectives

To provide reasonable assurance that Federal funds are used only during the authorized period of availability.

Control Activities

- Accounting system prevents obligation or expenditure of Federal funds outside of the period of availability.
 - The Director of Finance and ESSA HR reviews all grant applications approved by the awarding agency to identify the funding period. This information is communicated to the applicable Program Director to promote consistent use of grant funds throughout the period of availability. The Director of Finance and ESSA HR reviews all expenditures to ensure they are incurred within the proper funding period.
- Review of disbursements by person knowledgeable of period of availability of funds.
 - The Director of Finance and ESSA HR reviews all expenditures to ensure they are incurred within the proper funding period.

- End of grant period cut-offs are met by such mechanisms as advising program managers of impending cut-off dates and review of expenditures just before and after cut-off date.
 - The Director of Finance and ESSA HR reviews all expenditures to ensure they are incurred within the proper funding period.
- Cancellation of un-liquidated commitments at the end of the period of availability.
 - The Director of Finance and ESSA HR reviews open purchase orders within thirty days prior to the end of the period of availability. Open purchase orders are either paid (if goods have been received) or closed within that thirty day period.

PROCUREMENT AND SUSPENSION AND DEBARMENT

Control Objectives

To provide reasonable assurance that procurement of goods and services are made in compliance with the provisions of the *A-102 Common Rule* or *OMB Circular A-110*, as applicable, and that covered transactions (as defined in the suspension and debarment common rule) are not made with a debarred or suspended party.

Control Activities

- Job descriptions or other means of defining tasks that comprise particular procurement jobs.
 - Job descriptions have been created for all positions and are available in all District building offices.
- Contractor's performance with the terms, conditions, and specifications of the contract is monitored and documented.
 - An independent third-party construction manager monitors contractor's performance and reports financial information on a monthly basis to the Director of Finance and ESSA HR. The construction manager also meets with the District Operations Director and subcontractors to review the project's performance. Minutes of these meetings are prepared and forwarded to the Superintendent and Director of Finance and ESSA HR.
- Establish segregation of duties between employees responsible for contracting and accounts payable and cash disbursing.
 - The Board is responsible for approving the contracts based on bids received. The construction manager processes the contracts to each successful bidder. Upon receipt of progress billings, the construction manager bills the District on a monthly basis for all progress billings. The Director of Finance and ESSA HR processes billings and forwards them to the District Accountant for payment.
- Procurement actions appropriately documented in the procurement files.
 - All procurements are subject to the Board approved purchasing guidelines. Orders over \$1,500 require three written quotes. Formal sealed bids and Board approval is required for orders over \$10,000. Supporting documentation is maintained in accordance with the *Records Retention and Disposal Schedule for Michigan Public Schools*.
- Supervisors review procurement and contracting decisions for compliance with Federal procurement policies.

- The Director of Finance and ESSA HR reviews requests for proposals, bid proposals and/or quotes and the resulting purchase orders for compliance with Federal regulations.
- Procedures established to verify that vendors providing goods and services under the award have not been suspended or debarred by the Federal government.
 - The District Accountant performs a verification check for covered transactions by checking the Excluded Parties List System at <https://www.sam.gov> prior to contracting with a vendor.
- Official written policy for procurement and contracts establishing:
 - Contract files that document significant procurement history;
 - Methods of procurement, authorized including selection of contract type, contractor selection or rejection, and the basis of contract price;
 - Verification that procurements provide full and open competition;
 - Requirements for cost or price analysis, including for contract modifications;
 - Obtaining and reacting to suspension and debarment certifications; and
 - Other applicable requirements for procurements under Federal awards are followed.
 - Refer to the District's *Purchasing and Reimbursement Procedures* policy.
- Official written policy for suspension and debarment that:
 - Contains or references the Federal requirements;
 - Prohibits the award of a sub-award, covered contract, or any other covered agreement for program administration, goods, services, or any other program purpose with any suspended or debarred party; and
 - Requires staff to determine that entities receiving sub-awards of any value and procurement contracts equal to or exceeding \$25,000 and their principals are not suspended or debarred, and specifies the means that will be used to make that determination, i.e., checking the *Excluded Parties List System* (EPLS), which is maintained by the General Services Administration; obtaining a certification; or inserting a clause in the agreement.
 - Refer to the Federal Procurement section in the District's *Purchasing and Reimbursement Procedures* policy.

PROGRAM INCOME

Control Objectives

To provide reasonable assurance that program income is correctly earned, recorded, and used in accordance with the program requirements.

Control Activities

- Pricing and collection policies procedures clearly communicated to personnel responsible for program income.
- Mechanism in place to ensure that program income is properly recorded as earned and deposited in the bank as collected.
- Policies and procedures provide for correct use of program income in accordance with Federal program requirements.

Program income is gross income received that is directly generated by the Federally funded project during the grant period. The District does not currently receive Federally funded grants for programs that generate program income.

REAL PROPERTY ACQUISITION AND RELOCATION ASSISTANCE

Control Objectives

To provide reasonable assurance of compliance with the real property acquisition, appraisal, negotiation, and relocation requirements.

Control Activities

- Employees handling relocation assistance and real property acquisition have been trained in the requirements of the URA.
- Review of expenditures pertaining to real property acquisition and relocation assistance by employees knowledgeable in the URA.

The Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, provides for uniform and equitable treatment of persons displaced by Federally-assisted programs from their homes, businesses, or farms. The District does not currently receive Federal funded grants for these purposes.

REPORTING

Control Objectives

To provide reasonable assurance that reports of Federal awards submitted to the Federal awarding agency or pass-through entity include all activity of the reporting period, are supported by underlying accounting or performance records, and are fairly presented in accordance with program requirements.

Control Activities

This section incorporates reporting control activities for financial, performance and special reporting, as applicable.

- Written policy exists that establishes responsibility and provides the procedures for periodic monitoring, verification, and reporting of program progress and accomplishments.
 - The Director of Finance and ESSA HR reviews the *OMB Circular A-133 Compliance Supplement Part 4* for reporting requirements applicable to each grant. Responsibility reports are provided through access of the financial management system to generate the reports and are reviewed on a monthly basis and reviewed by the applicable Program Director and Director of Finance and ESSA HR for accuracy of information and progress of the grant. The Director of Finance and ESSA HR is responsible for accumulating the necessary data for timely reporting.
- Tracking system which reminds staff when reports are due.
 - Deadlines for grant reporting are notated in the Business Office with support of reminders through the Michigan Department of Education listserv.
- The general ledger or other reliable records are the basis for the reports.

- Responsibility reports are provided through access of the financial management system to generate the reports and are reviewed on a monthly basis and reviewed by the applicable Program Director and Director of Finance and ESSA HR for accuracy of information and progress of the grant. Other reports, such as pupil accounting records, are reviewed by the Director of Finance and ESSA HR periodically for accuracy and completeness.
- Supervisory review of reports performed to assure accuracy and completeness of data and information included in the reports.
 - Responsibility reports are generated from the District's financial software and reviewed by the Director of Finance and ESSA HR for accuracy of information. The financial, performance or special reports are prepared by the Director of Finance and ESSA HR based on the data from respective responsibility reports.
- The required accounting method is used (e.g., cash or accrual).
 - The Director of Finance and ESSA HR reviews the *OMB Circular A-133 Compliance Supplement Part 4* for reporting requirements applicable to each grant and prepares the report based on the applicable accounting method.

SUBRECIPIENT MONITORING

Control Objectives

To provide reasonable assurance that Federal award information and compliance requirements are identified to sub-recipients, sub-recipient activities are monitored, sub-recipient audit findings are resolved, and the impact of any sub-recipient noncompliance on the pass-through entity is evaluated. Also, the pass-through entity should perform procedures to provide reasonable assurance that the sub-recipient obtained required audits and takes appropriate corrective action on audit findings.

Control Activities

- Identify to sub-recipients the Federal award information (e.g., CFDA title and number, award name, name of Federal agency, amount of award) and applicable compliance requirements.
- Include in agreements with sub-recipients the requirement to comply with the compliance requirements applicable to the Federal program, including the audit requirements of *OMB Circular A-133*.
- Sub-recipients' compliance with audit requirements monitored using techniques such as the following:
 - Determining by inquiry and discussions whether sub-recipient met thresholds requiring an audit under *OMB Circular A-133*;
 - If an audit is required, assuring that the sub-recipient submits the report, report package or the documents required by OMB circulars and/or recipient's requirements; and
 - If a sub-recipient was required to obtain an audit in accordance with *OMB Circular A-133* but did not do so, following up with the sub-recipient until the audit is completed. Taking appropriate actions such as withholding further funding until the sub-recipient meets the audit requirements.
- Sub-recipient's compliance with Federal program requirements monitored using such techniques as the following:

- Issuing timely management decisions for audit and monitoring findings to inform the sub-recipient whether the corrective action planned is acceptable;
- Maintaining a system to track and follow-up on reported deficiencies related to programs funded by the recipient and ensure that timely corrective action is taken;
- Regular contacts with sub-recipients and appropriate inquiries concerning the Federal program;
- Reviewing sub-recipient reports and following-up on areas of concern;
- Monitoring sub-recipient budgets;
- Performing site visits to sub-recipients to review financial and programmatic records and observe operations; and
- Offering sub-recipients technical assistance where needed.
- Official written policies and procedures exist establishing:
 - Communication of Federal award requirements to sub-recipients;
 - Responsibilities for monitoring sub-recipients;
 - Process and procedures for monitoring;
 - Methodology for resolving findings of sub-recipient noncompliance or weaknesses in internal control; and
 - Requirements for and processing of sub-recipient audits, including appropriate adjustment of pass-through entity's accounts.

FINANCIAL MANAGEMENT SYSTEMS

The financial management system of the District must meet the following standards:

- Financial Reporting – Accurate, current, and complete disclosure of the financial results of financially assisted activities must be made in accordance with the reporting requirements of the grant.
 - See **REPORTING** section of this document.
- Accounting Records – Records adequately identify the source and application of funds provided for financially-assisted activities.
 - Accounting is done by analyzing, recording, summarizing and interpreting financial transactions of the District. The financial records system is adequate to provide financial and operational related information for all interested parties including, but not limited to, the District's Board of Education, administration, the public, auditors, local, State and Federal authorities, and District employees. It is also designed to demand accuracy and a reasonable degree of internal controls.
 - The District currently uses *Munis* financial software for financial management of the District. The software provides applications that allow for the completion of the accounting and payroll processes necessary to remain compliant with applicable State and Federal laws.
- Internal Control – Effective control and accountability must be maintained for all grant cash, real and personal property, and other assets. The District must adequately safeguard all such property and must assure that it is used solely for authorized purposes.
 - The District's internal controls over significant transaction streams are documented separately.

- Budget Control – Actual expenditures or outlays must be compared with budgeted amounts for each grant.
 - The District’s procedures for developing, approving and amending the budget are documented separately.
 - The Director of Finance and ESSA HR reviews the responsibility reports for each Federal grant comparing actual to budget on a monthly basis to monitor grant progress.

SUPPLIES

Materials and supplies are defined as tangible personal property other than equipment, costing less than \$5,000 (based on the District’s capitalization policy), or other lower threshold consistent with grantee policy. Materials and supplies that are necessary to carry out the project are allowable as prescribed in the governing cost principles. Title to supplies acquired under a grant or sub-grant will vest, upon acquisition, with the grantee or sub-grantee. If there is a residual inventory of unused supplies exceeding \$5,000 in total aggregate fair market value upon termination or completion of the award, and if the supplies are not needed for any other Federal sponsored programs or projects, the grantee or sub-grantee shall compensate the awarding agency for its share.

PAYMENTS

This section prescribes the basic standard and the methods under which a Federal agency will make payments to grantees and grantees will make payments to sub-grantees and contractors.

(See **CASH MANAGEMENT** section of this document.)

PAYROLL

Compensation for personnel services includes all remuneration, paid currently, for services rendered during the period of performance under Federal awards, including but not necessarily limited to wages, salaries, and fringe benefits. The costs of such compensation are allowable to the extent that they satisfy the specific requirements of this and other appendices under *2 CFR Part 225*.

- The employee’s total wage or salary is reasonable for the service rendered; i.e., it was consistent with wages or salaries paid for similar work in other activities of the District.
- The employee’s employment conformed to local employment laws and regulations meeting Federal merit system or other requirements, where applicable.
- The payroll charge is supported by documentation prescribed in *OMB Circular A-87*, attachment B, Paragraph 11.h for state and local governments which has been relocated to *2 CFR Part 225*.
- The payroll charge is supported by personnel activity reports; e.g., time and attendance records.

- Charges for leave, employee insurance, pension plans, etc., are reasonable and required by law, employee agreements, or an established policy of the District and are distributed equitably to Federal programs and other activities.
- Charges for authorized absences such as annual leave, sick leave, holidays, court leave, military leave and other similar benefits are allowable and are allocated equitably to all Federal programs and other activities.

FEDERAL TIMEKEEPING

The District performs the following to meet Federal timekeeping requirements:

- A payroll time sheet is completed each payroll period by any employee whose wage is being funded by a Federal grant source. This time sheet is reviewed and approved by the Program Director or applicable building Principal.
- Any employee whose time is split between a Federal grant and another funding source completes a Personnel Activity Report on a monthly basis indicating how much time was spent performing the functions funded by each source. This report is reviewed and approved by the Program Director or applicable building Principal.
- Any employee whose time is funded by a Federal source completes a Time Certification Form twice a year which is reviewed and approved by the Program Director or the applicable building Principal.
- Any employee who is providing instructional support services to students and is funded by a Federal grant, completes a log of the students he or she has worked with and what type of instructional support was provided.

COPYRIGHTS

Except as otherwise specified in the grant or by this paragraph, the grantee may own or permit others to own copyright in all subject writings. The grantee agrees that if it or anyone else does own copyright in a subject writing, the Federal government will have a non-exclusive, nontransferable, irrevocable, royalty-free license to exercise or have exercised for or on behalf of the United States throughout the world all the exclusive rights provided by copyright. Such license, however, will not include the right to sell copies or photocopy of the copyrighted works to the public.

RETENTION AND ACCESS REQUIREMENTS FOR RECORDS

Records are retained in accordance with the *Records Retention and Disposal Schedule for Michigan Public Schools*. All Michigan Freedom of Information Act requests are acted upon as soon as possible and within the timelines as stipulated within the Act.

CONFLICTS OF INTEREST/PECUNIARY INTERESTS

The District has approved a policy that the Board of Education shall not knowingly enter into a contract with any supplier of goods and/or services under which any Board member, officer,

employee or agent of the District has any pecuniary or beneficial interest, either direct or indirect, unless the person has not solicited the contract or participated in the negotiations leading up to the contract.

Board members and District personnel shall not accept any gifts or favors from vendors which might, in any way, influence their recommendations on the eventual purchase of equipment, supplies or services.

Purchases made by the District must not show any favoritism toward any vendor. Each order is placed in accordance with the policies of the Board on the basis of quality, price and delivery with past service as a factor if all other considerations are equal.

TRAINING FOR FEDERAL FINANCIAL INTERNAL CONTROLS AND PROCEDURES

All new employees are given proper training for the procedures itemized in this handbook by existing, experienced staff members. The length of training is commensurate with the amount of prior experience of the new employee and is adequate so he or she fully understands the financial procedures of the District. Employees receive refresher training as needed.

CONSEQUENCES OF COMPLIANCE FAILURES

All employees are instructed to follow the procedures contained herein. Any employee who does not follow these procedures as instructed will be disciplined in a progressive manner as itemized in the related Education Association contract agreements and/or in accordance with relative employment law.

RECEIPT OF HANDBOOK

I have received a copy of the Kenowa Hills Public Schools *Federal Financial Internal Controls And Procedures*. This handbook is the property of Kenowa Hills Public Schools. I understand this handbook is designed to acquaint me with the current procedures of Kenowa Hills Public Schools in regards to its Federal funded programs. I understand that Kenowa Hills Public Schools reserves the right to interpret, modify, or eliminate any of these procedures at any time. As a recipient of this handbook, I understand that I am responsible for knowing its content and any updates.

Employee Name (Printed)

Employee Signature

Date

Director of Finance and ESSA HR

Date

The original signed document will be kept in the employee's personnel file until three years after leaving the District.