

LEA 566

FEDERAL CASH MANAGEMENT PROCEDURES

The LEA will comply with all applicable methods and procedures for payments that minimize the time elapsing between the transfer of funds and disbursement by the LEA, in accordance with the Cash Management Improvement Act at 31 CFR Part 205. Generally, the LEA receives payment from the State Department of Education on a reimbursement basis. 2 CFR § 200.305. However, if the LEA receives an advance in federal grant funds, the LEA will remit interest earned on the advanced payment quarterly to the federal agency. The LEA may retain interest amounts up to \$500 per year for administrative expenses. 2 CFR § 200.305(b)(9).

According to guidance from the U.S. Department of Education (ED), when calculating the interest earned on ED grant funds, regardless of the date of obligation, interest is calculated from the date that the federal funds are drawn down from the G5 system until the date on which those funds are disbursed by the LEA.

Interest would not accrue if the LEA uses nonfederal funds to pay the vendor and/or employees prior to the funds being drawn down from the G5 system, commonly known as a reimbursement.

Payment Methods

Reimbursements: The LEA will initially charge federal grant expenditures to nonfederal funds.

The LEA Business Manager will request reimbursement for actual expenditures incurred under the federal grants quarterly. The Business Manager will provide the Executive Director with a detail ledger with the quarterly expenses to review and approve. Once approved, the Business Manager will submit the reimbursement request in the Grant Reimbursement Application. If documentation is required, the Business Manager will provide.

Federal subawards/allocations: All reimbursement requests will be submitted through the Grant Reimbursement Application (GRA) electronically.

GRA portal: <https://apps.sde.idaho.gov/GrantReimbursement/>

The State Department of Education will process reimbursement requests received on or before the 10th of the month and the 24th of the month, and will be paid by the 11th and 25th of the month, accordingly.

Some funding will require the completion of traditional paper invoices or separate reimbursement requests.

GRA requests or invoices (whichever applies) are submitted to the State Department of Education. All reimbursements are based on actual disbursements, not on obligations.

Consistent with state and federal requirements, the LEA will maintain source documentation supporting the federal expenditures (invoices, time sheets, payroll stubs, etc.) and will make such documentation available for State Department of Education review upon request.

Reimbursements of actual expenditures do not require interest calculations.

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Reimbursements of actual expenditures do not require interest calculations.

Timely Obligation of Funds

When Obligations are Made

Obligations are orders placed for property and services, contracts and subawards made, and similar transactions during a given period that require payment by the non-Federal entity during the same or a future period. 34 C.F.R. § 200.71

The following table illustrates when funds are determined to be obligated under federal regulations:

If the obligation is for:	The obligation is made:
Acquisition of property	On the date which the LEA makes a binding written commitment to acquire the property
Personal services by an employee of the LEA	When the services are performed
Personal services by a contractor who is not an employee of the LEA	On the date which the LEA makes a binding written commitment to obtain the services
Public utility services	When the LEA receives the services
Travel	When the travel is taken
Rental of property	When the LEA uses the property
A pre-agreement cost that was properly approved by the Secretary under the cost principles in 2 CFR part 200, Subpart E-Cost Principles.	On the first day of the project period

34 C.F.R. § 75.707; 34 C.F.R. § 76.707.

Period of Performance of Federal Funds

State-Administered Grants (*Grants that are received through the pass-through agency such as State Department of Education*)

All obligations must occur on or between the beginning and ending dates of the grant project. 2 C.F.R. § 200.309. This period of time is known as the period of performance. 2 C.F.R. § 200.77. The period of performance is dictated by statute and will be indicated in the GAN. Further, certain grants have specific requirements for carryover funds that must be adhered to.

State-Administered Grants (also known as pass-through grants) are available for 27 months.

The period of availability is 27 months. Federal education grant funds are typically awarded on **July 1 of each year**. This maximum period includes a 15-month period of initial availability, plus a 12-month period for carryover 34 C.F.R. § 76.709. For example, funds awarded on July 1, 2015 would remain available for obligation through September 30, 2017.

The following grants have the period of availability of 27 months:

Grants under the Individuals with Disabilities Education Act (IDEA)

- IDEA Part B
- Preschool

Grants under Every Student Succeeds Act (ESSA)

- Title I, Part A - Improving Basic Programs
- Title I, Part A (Sec. 1003) - School Improvement
- Title I, Part C - Education of Migratory Children
- Title I, Part D - Prevention and Intervention Programs for Children and Youth who are Neglected, Delinquent, or at Risk
- Title II, Part A - Supporting Effective Instruction
- Title III - Language Instruction for English Learners and Immigrant Students
- Title VI-B, (Sec. 5003) - Rural Education Initiative (Title will change to Title V in 2017)
- Title X - Education for the Homeless (Title will change to Title IX in 2017)

All grants under ESSA (coming in 2017) have limitation on maximum carryover amounts (see following pages).

Carryover

State-Administered Grants (also known as pass-through grants). As described above, the Tydings Amendment extends the period of availability for applicable state-administered program funds. Essentially, it permits recipients to “carryover” any funds left over at the end of the initial 15-month period into the next year. These leftover funds are typically referred to as carryover funds and continue to be available for obligation for an additional 12 months.

34 C.F.R. § 76.709. Accordingly, the LEA may have multiple years of grant funds available under the same program at the same time.

Carryover limitation depends on program requirements:

Program	Maximum Percent of Total Allocation
Title IA Basic Program	15%
Title IC Migrant Program	15%
Title IIA Improving Teacher Quality	25%, reasonable and necessary
Title III English Language Acquisition	reasonable and necessary
Title VI-B Rural and Low Income	25%, reasonable and necessary
IDEA Part B	>10% will require justification

Carryover Procedures

For all applicable grants, the carryover certification/verification is part of the grant application process. The State Department of Education (SDE) requires that each LEA calculate the amount of funds to be carried from one school year to the next and include the carryover amount in the current school year's budget. Each LEA must submit an application for funding to the SDE to receive Federal grants at the LEA level. The calculation of carryover amount is part of the plan and budget. Preliminary carryover amount is estimated by the LEA upon each Federal application submission. When final allocations are available, the LEA will adjust the budgets to align the final allocation amount with the internal budget, as well as reflect the actual carryover amount as of September 30th.

Excess Carryover for ESSA grants only: Should an LEA exceed the carryover limitation and be ineligible for a waiver, the amount that has been exceeded reverts back to the State.

Waiver: The LEA may waive the carryover limitation if the State Department of Education determines that the request of an LEA is reasonable and necessary.

Program	How often can waiver be requested?
Title IA Basic Program	Once every three years
Title IC Migrant Program	Waived with exception per occurrence
Title IIA Improving Teacher Quality	Waived with exception per occurrence

Title III English Language Acquisition	Waived with exception per occurrence
Title VI-B Rural and Low Income	Waived with exception per occurrence

The waiver is submitted through the comment section of the Consolidated Federal and State Grants Application. Narrative explanation:

- ✓ WHY the LEA has the excess carryover
- ✓ The plan to expend the funds in the coming year, to avoid the excess carryover in the future

Program Income

Program income does not apply to our LEA.

Definition

Program income means gross income earned by a grant recipient that is directly generated by a supported activity or earned as a result of the federal award during the grant's period of performance. 2 C.F.R. § 200.80.

Policy History:

Adopted on: June 2, 2021

Revised on: