



## Superintendent's Circular

NUMBER:  
FIN-09  
Version 01

### PRIVATE CONTRIBUTIONS MANAGEMENT GUIDELINES

*This circular will remain in effect unless rescinded or superseded by a subsequent version.*

#### BOSTON PUBLIC SCHOOLS PRIVATE CONTRIBUTIONS

All external funding — to the district as a whole, individual schools, central offices, or fiscal sponsorship — that is received from private sources, such as foundation grants, contributions, and individual donations other than public state and federal grants, must adhere to the established rules and guidelines set forth in this circular.

Schools may not receive cash grants directly into activity accounts or any other accounts maintained by the school (see Superintendent's Circular FIN-04, Student Activity Accounts). Schools and departments may solicit in-kind services and contributions from private sources (businesses, non-profit foundations, and individuals) to be made to the Boston Public Schools via the Boston Educational Development Foundation, Inc. (BEDF) in accordance with the guidelines set forth in [State Ethics Commission opinion EC-COI-12-1](#). Programs funded by private philanthropy must further BPS goals. Funds will not be accepted from sources specifically precluded by the School Committee (there are no fund sources specifically precluded at this time).

## **ROLES AND RESPONSIBILITIES**

All private funds must comply with funders' intentions and guidelines established by BEDF regarding programming, spending, accounting, and auditing, as well as related to civil rights, access, and confidentiality as per the public use of these funds.

The **program supervisor** is the individual who will be responsible for overseeing the program(s) or initiative that private contributions are funding.

The **fund manager** is the department head or the respective principal/head of school and/or a designee and will be the primary point of contact for all management issues for BEDF. The fund manager will take fiscal responsibility for managing private contributions and assure the submission of proper reporting to funders.

BEDF has fiduciary and financial oversight responsibility for private-funded programs, including compliance with all relevant regulations and reporting. BEDF must sign contracts and other legal documents that could raise a liability and oversee the full execution of grant agreements and/or award letters. BEDF will follow guidelines set by its Board of Directors and funders' restrictions and will collaborate to comply with other requirements related to civil rights, access, and confidentiality.

## **ABOUT BEDF**

## **Mission**

The Boston Educational Development Foundation, Inc. (BEDF) was founded in 1984 by the superintendent and School Committee for departments and schools to improve their ability to raise money from private sources including foundations, corporations, and individuals.

BEDF is a 501(c)(3) that exists to improve educational opportunities for the students of BPS. BEDF provides fiscal sponsorship and fundraising support for programs and opportunities that may otherwise not be possible, such as: out of school time; enrichment and health initiatives for students; leadership and professional development for teachers; engagement and learning programs for families; and multiple academic initiatives.

## **Fiscal Sponsorship Services**

BEDF provides general, financial, and administrative management and staffing to private-funded programs that further the educational aims and goals of BPS. BEDF also provides fundraising support in the following areas: grant seeking and administration; assistance in grants review and submission; and the creation of online fundraising campaigns for schools and programs.

## **Indirect Rate**

BEDF charges an 8% indirect rate on all grants, donations, sponsorships, and other charitable contributions for which BEDF serves as the fiscal sponsor. This indirect rate does not apply to any BPS student scholarships. The BEDF Board of Directors has the authority to change the rate at any time by giving written notice to Fund Managers.

## **PRE-AWARD**

All BPS staff, parents, and partners are encouraged to seek and apply for private funding opportunities from a variety of sources. School fundraising is a team process within the department/school to enable those individuals who will ultimately be responsible for implementing the programs to be involved. Heads of schools, principals, and other administrative heads must be aware of and approve private solicitations for programs that will take place under their supervision.

### **Intent to Apply**

All BPS entities planning to pursue a private funding opportunity must submit an online [Intent to Apply Form](#) (for asks above \$10,000) 1-3 months prior to the deadline for submission, if possible. This will ensure that potential funding applications are consistent with BPS goals and are not in conflict with other BPS solicitations to the same agencies and funders.

The Intent to Apply Form will be revised on a weekly basis by the cross-functional BPS Grants Review Team and will communicate a recommendation to the applicant. Upon confirmation, you will receive a completed grant cover page to be signed by your department head/supervisor. For grant applications seeking letters of support, a brief form will be attached as well.

## **POST AWARD**

BEDF holds private funds through a set of strictly segregated funds (previously called accounts). Either fund managers or funders must forward the award letter and/or grant agreement (that includes program and budget information) along with the

deposit form to BEDF. If a new account is needed, the fund manager should submit the proper form. BEDF will notify within five business days upon receipt.

## **SPENDING, MONITORING, AND REPORTING**

### **Spending**

Funds held at BEDF will adhere to BEDF current spending, financial, and administrative policies regarding accounts receivable and payable, employee stipend documentation, and any other administrative controls established. For privately funded programs, BEDF only compensates individuals as independent contractors (1099) or through the BPS approved commitment letter process (if individuals are BPS employees). Individuals are subject to applicable state and federal taxes. Programs will keep their own records to comply with applicable BPS regulations. Please contact BEDF at [admin@bedf.org](mailto:admin@bedf.org) for detailed information.

The BEDF executive director must co-sign all contracts and other documents in which BEDF could incur liability, legal exposure, or financial obligations, including purchase orders and grant agreements, on behalf of the programs.

For internal controls, all expenses require signoff by the fund managers or designee before any costs can be incurred or payments released.

The fund manager is responsible for monitoring the spending of the private funds. This includes assuring that the funds are being used for allowable expenses; spending according to the contribution timeline; entering receipt for goods/services; and submitting invoices to BEDF for all matters related to their

program budget. In case private-funded program budgets need to be amended, they should get approval from the funder. BEDF will ensure these responsibilities are fully completed in accordance with the provisions of the funder and these guidelines.

### **Monitoring**

Fund managers are responsible for preparing and submitting interim reports as requested by funders. BEDF will support completions and take the appropriate steps to ensure timely report submission.

Programmatic grant reports are the responsibility of the fund manager who is overseeing the program being funded. Fund managers must send a copy of completed reports to BEDF.

### **Final Reports**

BEDF will produce a financial report to be finalized and complemented with program outcomes by the fund manager in order to complete and submit a final report as per the funder guidelines. Please submit a copy of the final version to BEDF for record keeping purposes. BEDF will take proper measures to assure fiduciary responsibility to funders, including freezing the activity of the fund until submission is complete.

### **AUDITING**

The fund manager and program supervisor will collaborate with auditors, consultants, and program advisors as requested by BEDF to ensure compliance with tax regulations and impact assessment of the partnership with BPS, including site visits and data collection efforts.

For general inquiries, please email [admin@bedf.org](mailto:admin@bedf.org).

For more information about this circular, contact:

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