

## Superintendent's Circular

NUMBER: FIN-10 Version 01

## **GRANTS GUIDELINES**

This Circular will remain in effect unless rescinded or superseded by a subsequent version.

#### **BOSTON PUBLIC SCHOOLS GRANTS**

All grants going to the Boston Public Schools — to the district as a whole, individual schools, or central offices — must adhere to federal, state, city, and district policy. This circular contains the grant management standards and procedures the district uses to ensure all funds are lawfully expended.

Based on the funding source, grants will be housed in either the Office of Grants and External Funding or the Boston Educational Development Foundation (BEDF). All federal and state grants, as well as some private grants, are housed in the Office of Grants and External Funding and must adhere to the following information. Private grants that are housed in the Boston Educational Development Foundation (BEDF) 501c3 account must adhere to the rules and regulations of BEDF. Information on BEDF can be found in Superintendent's Circular FIN-09.

#### **ROLES AND RESPONSIBILITIES**

All grants must adhere to federal, state, city, and Boston Public Schools requirements for purchasing, accounting, auditing, civil

rights, access, and confidentiality, as well as established guidelines set forth by the funder. Regulations for state and federal grants are published in the Grants Management Procedural Manual published by the Bureau of Grants Management of the Massachusetts Department of Education. All federal grants must comply with EDGAR 2 C.F.R.§ 200. All policies and procedures, as well as internal controls and grant management standards used by the BPS to ensure that all funds are lawfully expended are outlined in the Fiscal Policies and Procedures Manual.

Any individual who works under a grant, expends grant funds, or oversees a department that utilizes grant funds is responsible for lawfully expending grant funds.

## GRANT GUIDELINES FOR GRANTS IN THE OFFICE OF GRANTS AND EXTERNAL FUNDING

The following documents are required when seeking grant funding:

- Intent to Apply Form
- School Committee Approval Form
- Boston Fiscal Policies and Procedures
- Grants Subrecipient and Responsibilities

Program managers and grant applicants are responsible for implementing the following rules for seeking and managing grants:

 Most federal and state grants follow the 'supplement and not supplant' rule. This means grant money must not be used to replace positions previously funded with local money and should not be used to fund non-salary items that are the responsibility of the local school district. For example, grant funds may not be used to fund classroom teachers or administrative personnel, as these positions are considered core. A clear indication of supplanting is shifting a position from GSP to a grant.

- 2. Grant-funded programs should be self-sufficient. Awarded funds must cover all expenses of the program, including wages, benefits, supplies, transportation, utilities, custodial requirements, and fees. Please consult the Office of Grants and External Funding and the Budget Office for approval of any exceptions. If technology is involved, applicants should consult with the Office of Information and Instructional Technology (OIIT) to ensure that they are in support of the proposal.
- 3. All BPS policies, procedures, rules, and regulations apply to grant- funded programs. Regular personnel, budget, and business procedures apply to grant funded programs in the same way they apply to locally funded programs. Please reference appropriate budget, business, and human capital memoranda for rules and procedures.
- 4. No agreement to apply for or be a subrecipient of a grant is to be entered into with an outside organization or entity on behalf of the district without the approval of the Grants and External Funds Office.

#### PRE-AWARD

All BPS staff, parents, and partners are encouraged to seek and apply for grant opportunities from a variety of sources. Grant development should be a team process within the

department/school to enable those individuals who will ultimately be responsible for implementing the grant to be involved. Heads of school, principals, and other administrative heads must be aware and pre-approve grant proposals for programs that will take place under their supervision.

#### INTENT TO APPLY

All BPS entities planning to pursue a grant opportunity must submit an online Intent to Apply form for all federal and state grants, as well as private grants over \$10,000. The Intent to Apply form should be submitted as soon as the funding opportunity and applicant have been identified, but no less than 3 weeks before the grant due date. This will ensure that potential grant applications are consistent with BPS goals and policies and are not in conflict with BPS solicitations for funds to the same agencies and donors.

Your intent to apply will be reviewed on a weekly basis. Upon approval, you will receive a completed Grant Cover Page with your submitted information and details on next steps.

## **Superintendent Signature**

The Office of Grants and External Funding will facilitate obtaining the superintendent's signature on your behalf. Please submit the Intent to Apply form, and the Office of Grants and External Funding will contact you within ten (10) days with next steps. All documents requiring signature (including electronic signature) must be submitted at least one week (7 days) before they are due. All proposals must be submitted through the Intent to Apply form and obtain approval to move forward from the Grants Review Team before signatures will be obtained.

## **Letter of Support**

The Office of Grants and External Funding will facilitate and obtain all signatures on letters of support from the superintendent and mayor (for federal grants). Once the Intent to Apply has been reviewed and approved by the Grants Review Team, please draft a letter of support for signature. All letters requiring signature must be submitted at least one week (7 days) before they are due.

If you are requesting a letter of support from BPS not tied to a BPS grant application, please complete the online <u>Letter of Support Request Form</u>. The Office of Grants and External Funding will follow up with next steps.

#### **BUDGET CREATION**

The Office of Grants and External Funding can assist with developing and reviewing your application's budget. Once you complete the online Intent to Apply Form, the Office of Federal and Grants will contact you. Please reply to this communication to schedule time to create and review your budget. All budgets must adhere to BPS, state, and federal regulations and budgets that do not adhere will need to be amended before BPS will approve or allow spending.

#### SUPERINTENDENT SIGNATURE

All grant applications that will be submitted to external funders (private, state, and federal) must have internal BPS approval prior to submission. The Office of Grants and External Funding will facilitate this process.

After completing the Intent to Apply form, the Office of Grants

and External Funding will contact you with next steps. All documents requiring signature (including electronic signature) must be submitted at least one week (7 days) before they are due. The superintendent is the only authorized representative who can sign grant proposals on behalf of BPS.

BPS can submit the grant to the funder on the requester's behalf. In some cases, grants can also be submitted directly from the program manager, if so preferred, but only after all prior steps are completed.

#### ONCE GRANT HAS BEEN AWARDED

## **School Committee Approval**

All grants being managed through the Office of Grants and External Funding must be approved by the School Committee before they can be officially accepted by BPS. Similarly, the School Committee's approval is required before the Office of Grants and External Funding can gain access to the grant funds in conjunction with City Hall. Therefore, as soon as a grant application has been submitted, the grant may be submitted for School Committee approval.

To obtain School Committee approval, three steps must be completed:

 A packet of School Committee materials is submitted to the Office of Federal and State Grants. This packet includes a complete <u>School Committee Acceptance Form</u>, the full grant budget, the grant narrative, the signed cover page (if available), MOA/MOU (if available), and award letter (if available). This must be submitted no later than 14 days prior to any School Committee meeting.

- 2. A meeting is held between the program manager and the Office of Grants and External Funding.
- 3. The program manager attends the School Committee meeting, answering any questions that may arise surrounding the grant.

Once the grant has been approved by the School Committee, official confirmation of the School Committee acceptance will be sent out to the requester via email approximately 2 days after the School Committee vote.

Please contact Coordinator, Office of Grants and External Funding at <a href="mailto:finance-staff@bostonpublicschools.org">finance-staff@bostonpublicschools.org</a>, with any questions about or requests for School Committee approval.

## **Grant Set-up**

Once a 'notice of payment' (official award letter from grantor), funding wire or MOA/executed contract has been received by the Office of Grants and External Funding and the grant has received School Committee approval, the grant set-up process will begin. During the set-up process, the Office of Grants and External Funding will map the submitted budget to the BAIS Financials/PeopleSoft system. The grant will be set up according to the budget that was approved by the funder. Once the budget is set up within BPS, it is set up in the City of Boston's system. The Office of Grants and External Funding will alert program managers once this occurs and spending may then begin. This process takes approximately eight days from the date the payment notice is received. For questions on grant set up, please contact the coordinator of Federal and State Grants, Carlos

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Coordinator, Office of Grants and External Funding (<u>finance-staff@bostonpublicschools.org</u>).

#### **GRANT SPENDING**

## **Grant Monitoring and Spending**

It is the responsibility of the program manager to monitor the spending of the grant. This includes: assuring that the grant funds are being used for allowable expenses; spending according to the grant timeline; working closely with the Business Office to process any contracts and/or procurement needs; entering all requisitions; monitoring purchase orders; entering receipt for goods/services; and submitting invoices to Accounts Payable for all work orders related to their budgeted grant funds. It is the responsibility of the program manager's supervisor to assure these responsibilities are fully completed according to requirements and to offer assistance, when necessary.

Throughout the life of a grant, the budget may need to be adjusted. This is done through budget transfers in the BAIS Financials system. Changes may be made among grant lines but not into or out of a grant to make changes to the grand total. Changes to the initial grant intent are NOT allowable.

Before any changes are made to the approved grant budget, approval should be obtained from the funder. An amendment may be required. If so, the Office of Grants and External Funding will help with completing and filing the amendment. Please contact Carlos Martinez, Coordinator of Federal and State Grants, regarding amendments.

## **Subrecipient Monitoring and Spending**

In accordance with the Uniform Grant Guidance, all sub awards — where BPS is serving as the pass-through entity — must be clearly identified and managed according to the standards set forth by Federal Regulations, 2 CFR 200.331. The program manager is responsible for communicating federal regulations and assuring that subrecipients adhere to sub-award regulations. Please contact the Office of Grants and External Funding for more information about subrecipient monitoring.

## **Grant Spending Reports**

Program managers will receive quarterly spend-down reports from the Office of Grants and External Funding. The report is designed to provide a high-level overview of spending, as well as spending details. It is the responsibility of program managers to look through the report, identify any errors in spending, and report back any programmatic changes that may have affected the budget timeline.

#### **Amendments**

An amendment is necessary when there is a modification to the scope or finances of a previously approved grant application. When the scope of a project changes significantly or the expenditure of a budgeted category exceeds a variance of 10% or \$10,000, whichever is greater, an amendment is needed. Amendments should be submitted at least 30 days prior to the desired change. Most federal and state grants require a final amendment to be filed no later than 30 days prior to the end of the grant. The Office of Grants and External Funding will submit any amendments necessary but will need justification from the

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Program Manager on why the changes occurred.

#### **GRANT CLEAN UP AND CLOSE OUT**

## **Grant Clean-up**

In the final weeks of the grant, clean-up must occur for most grants. To close out a grant and file a final amendment, there may not be any remaining requisitions, and all purchase orders must be fully received. It is the responsibility of the program manager to assure that the grant is clean for close and final reports.

Prior to the grant end date, all requisitions must either be canceled or converted to purchase orders. All purchase orders must be fully received in BAIS financials by the grant end date. If a purchase order will not be paid in full, the remainder must be canceled prior the grant end date. It is the responsibility of the program manager to monitor clean up, work with the Business Office to convert requisitions, cancel POs, and enter receipts for goods and services.

Stipend requests (PS08s) must be submitted and approved before stipend work can be performed. Final stipend paperwork (PS09s) must be submitted within two weeks of the stipend period ending, hence no later than two weeks of the grant end date. Failure to purchase items or submit stipend requests by the above deadlines may result in forfeiting of funds.

## **Grant Outcomes Reporting**

At the conclusion of each grant, program managers must report the outcomes of their SMART goals presented to the School Committee. The Office of Grants and External Funding will reach Superintendent's Circular FIN-10 Page 11 of 14

out to program managers for this information. This report will be shared with the School Committee and key stakeholders.

### **Grant Close**

Grant funds must be spent prior to the grant end date. Funds not utilized by this end date will be forfeited. For grant compliance purposes, only funds that are encumbered — as defined by being on a purchase order and fully received in BAIS financials — or expended by the grant end date can be claimed under the grant. The program manager is responsible for assuring that this occurs by the grant end date.

### FISCAL REPORTING

All fiscal reporting will be completed by, or must be reviewed by, the Office of Grants and External Funding/Auditing Department. No fiscal report may be submitted to the funder without review by the Office of Grants and External Funding/Auditing Department.

## **FINAL REPORTS**

Final financial reports will be completed by the Auditing Department. Final reports are due to the funder 60 days after the grant closes. To assure that a final report is filed on time, all requisitions and open purchase orders should be cleaned up as soon as possible after the grant end date. Once the final report has been completed and submitted, a copy will be sent to the program manager for record-keeping purposes.

### **MULTI-YEAR GRANTS**

Multi-year or continuing federal and state grant accounts must

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be established at the start of each fiscal year. Accounts are not automatically opened or carried forward from year to year. Therefore, responsible administrative heads, department managers, and relevant program managers should share, on an annual basis, all award notification from their respective funders with the Office of Grants and External Funding

## PROGRAMMATIC REPORTING

Programmatic grant reports are the responsibility of the program manager who is supervising the grant implementation. Please share all such completed reports with the Office of Grants and External Funding. Grant-related financial reports and requests for revenue are managed by the BPS Business Office. However, please share any relevant details for these well in advance, with Director of State & Federal Grants (finance-

<u>staff@bostonpublicschools.org</u>) and/or Coordinator, Office of Grants and External Funding (<u>finance-</u>

staff@bostonpublicschools.org), so they can be submitted to the funder by the intended deadline.

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### **GRANTS MANAGEMENT RESOURCES**

## **Grants Website**

The Office of Grants and External Funding provides information about grants at BPS, resources for finding grant opportunities, contact information, process and policy information, the quarterly newsletters, and constant updates that may impact grants.

## <u>Internal Grants Management Library</u>

This internal resource provides detailed information about managing a grant in BPS. This searchable and constantly updated document includes common grant application answers, key application documents, how-to guides on running common reports, and step-by-step instructions on how to manage a budget, contact information, and information on how to perform most grant activities in BPS.

# CONTACT INFORMATION FOR OFFICE OF GRANTS AND EXTERNAL FUNDING

Director of State & Federal Grants 617-635-9577

Email: finance-staff@bostonpublicschools.org

Senior Grants Manager 617-635-8582

Email: finance-staff@bostonpublicschools.org

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Coordinator, Office of Grants and External Funding 617-635-9084 Email: <a href="mailto:finance-staff@bostonpublicschools.org">finance-staff@bostonpublicschools.org</a>

Accounting Coordinator 617-635-9466 Email: TBD

External Funding Analyst - Please see <u>Superintendent's Circular</u> <u>FIN-04</u>, <u>Student Activity Accounts</u>.

## For more information about this circular, contact:

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Mary Skipper, Superintendent