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# SUPERINTENDENT OF PUBLIC INSTRUCTION

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August 31, 2018

( ) Action Required  
(X) Informational

## BULLETIN NO. 082-18 GRANTS MANAGEMENT

**TO:** Educational Service District Superintendents  
School District Superintendents  
Assistant Superintendents for Business and/or Business Managers  
Business Managers of State Universities and Colleges, Selected State Agencies,  
Private Universities and Colleges, and Nonprofit Organizations

**FROM:** Chris Reykdal, Superintendent of Public Instruction

**RE:** Grant Award Reporting and Processes for Federal and State Grants Received  
Through the Office of Superintendent of Public Instruction (OSPI) for Fiscal Year  
2018–19

**CONTACT:** Michelle Sartain, Supervisor, Grants Management  
360-725-6282; Agency TTY: 360-664-3631  
Email: [michelle.sartain@k12.wa.us](mailto:michelle.sartain@k12.wa.us)

### **PURPOSE/BACKGROUND**

This bulletin sets forth the Fiscal Year (FY) 2018–19 grant payment processes, expenditure reporting, budget revision policy, and information about carryover funds and indirect costs for federal and state grant programs issued through the iGrants system (excluding the Child Nutrition programs administered in the Washington Integrated Nutrition System (WINS)).

### **GENERAL FEDERAL REQUIREMENTS RELATED TO CLAIMS PROCESSING**

#### Federal Cash Management (2 Code of Federal Regulations (CFR) Part 200.305)

Cash Management requirements are in place to minimize the time between the receipt of federal funds and disbursement of those funds to no longer than 3 days. You must have a system in place to ensure your claim for reimbursement of expenditures:

- Reconciles to your accounting system.
- Includes only expenditures that have already been disbursed or will be disbursed within three days of receipt of those funds.

If you have funds on hand longer than 3 days or transfer funds out of federal programs subsequent to reimbursement, you will need to calculate interest earned on those federal funds from the time the funds were received until the time they were actually disbursed. Districts are allowed to retain earned interest up to \$500 per year for administrative expenses. You will need to remit interest earned over \$500 to OSPI using non-federal resources.

Period of Performance (34 CFR Part 76.707 and 2 CFR Part 200.309)

**Federal** grant funds can be used only for costs “obligated” during the grant period. Therefore, goods received and services performed may be charged to the grant if: 1) there is a legal commitment in place prior to the end of the grant period (obligated), and 2) subsequently received or performed and paid for during the close out period (liquidated). For example, a contract was signed in August, services performed in September, and payment made in October. Since there was a contract in place prior to September 1, the resulting expenditures can be charged to the grant ending on August 31. For additional information regarding the grant close out period, see the “expenditure reporting” section of this bulletin.

The following table shows when an obligation has occurred for various kinds of property and services:

If the obligation is for -	The obligation is made -
(a) Acquisition of real or personal property	On the date the subgrantee makes a binding written commitment to acquire the property.
(b) Personal services by an employee	When the services are performed.
(c) Personal services by a contractor who is not an employee	On the date which the subgrantee makes a binding written commitment to obtain the services.
(d) Performance of work other than personal services	On the date which a subgrantee makes a binding written commitment to obtain the work.
(e) Travel	When the travel is taken.
(f) Rental of real or personal property	When the subgrantee uses the property.
(g) Approved pre-agreement cost	On the first day of the grant performance period.

In contrast, for **state** grants, all obligations must be fulfilled by the end of the grant period (e.g., all goods must be received and services completed by the grant ending date).

When Subgrantees May Begin Obligating Funds (34 CFR Part 76.708)

For **federal** formula grants, you may not begin obligating funds until the later of: a) The date the state may begin to obligate funds (generally July 1), or b) the date you submit an application in substantially approvable form. The Substantial Approvable Status timeline can be found on iGrants under “General Resource Information.”

For **federal** competitive grants, you may not begin obligating funds until the subgrant is made. However, you may request pre-approval from OSPI for pre-award costs you incurred prior to the subgrant being made.

Carryover Funds

**Federal** funds eligible for carryover into the subsequent period shall be used in accordance with federal statutes and regulations that apply to the program and are in effect for the carryover period. (34 CFR, Part 76.709-710)

The following table lists **federal** programs that allow carryover (C/O) by their Catalog of Federal Domestic Assistance (CFDA) number:

<b>PROGRAM</b>	<b>CFDA NUMBER</b>	<b>C/O % ALLOWED</b>
21st Century Community Learning Centers	84.287C	5%
REAP Flexibility and Accountability	84.367A	100%
Rural and Low-Income Schools	84.358B	100%
Special Education IDEA-B, Sections 611 & 619 CSA	84.027A/84.173A	10%
Special Education IDEA-B, Sections 611 & 619 Flow-Through	84.027A/84.173A	100%
Title I, Part A	84.010A	15%
Title I, Part D Education Advocate, CSA	84.010A	40%
Title I, Part D Health Services Project, CSA	84.010A	40%
Title I, Part D Neglected and Delinquent - Local	84.010A	40%
Title I, Part D Neglected and Delinquent - State	84.013A	40%
Title II, Part A Teacher & Principal Training & Recruiting	84.367A	100%
Title III, Immigrant	84.365A	100%
Title III, LEP	84.365A	100%
Title IV, Student Support	84.424A	100%

If you need additional information, please review the iGrants profile page for each program and/or contact the program supervisor.

Unexpended **state** grant funds from 2017–18 **cannot** be carried over into FY 2018–19. State general fund appropriations for the 2017–19 biennium have been separately earmarked and allotted for each fiscal year of the biennium and may not be transferred between fiscal years. This does not include learning assistance program (LAP), state special education, or state transitional bilingual instructional program (TBIP), which are state categorical funds subject to different state statutes.

### **GRANT PAYMENT PROCESS**

The grant payment process is generally on a reimbursement basis for both state and federal grants. For federal grants, a district may submit a claim for both actual and anticipated disbursements; however, funds received for anticipated disbursements are considered to be on an advance basis, and subsequent disbursement must occur within three days of receipt of those funds.

Subgrantees will receive funding reimbursement through the monthly apportionment process. Grant reimbursements appear as a line entry by revenue account number on Report 1197, Statement of Apportionment. Individual federal and state grant award information, including current expenditure and available balance information, appears on Report 1191FG. Both reports are posted electronically at the end of each month by School Apportionment and Financial Services.

### Expenditure Reporting

In order for OSPI to meet federal deadlines, districts are required to liquidate and claim their FY 2018–19 expenditures no later than the 3<sup>rd</sup> month following the end of the budget period. For example, if your grant budget period is 9/1/18 thru 8/31/19 your final expenditure report is due by November 18, 2019.

Subgrantees submit claims through the Education Data System (EDS) Grants Claim System automated expenditure reporting process. Monthly claims are due by 4:30 p.m. on the following dates in order to be reimbursed at month end. If this deadline is missed, reimbursement will not occur until the end of the next month a claim is submitted by the cutoff date.

September 18, 2018	February 19, 2019	July 22, 2019
October 19, 2018	March 20, 2019	August 21, 2019
November 16, 2018	April 19, 2019	September 18, 2019
December 18, 2018	May 21, 2019	October 22, 2019
January 22, 2019	June 19, 2019	November 18, 2019

**PLEASE NOTE** reimbursements for state grants are paid through the EDS Grants Claim System for all fiscal year expenditure reports submitted by the July 2019 cutoff. In August 2019, the Grants Management Office will send out an email requesting claim data to be sent back by email pertaining to the balances or closure of state grants. This information will be used to compile and record OSPI accruals for the close of the state fiscal year.

Final **cumulative** expenditure claims for all accrued state grants must be submitted to OSPI no later than September 18, 2019, in order to receive reimbursement.

If you have questions regarding your reimbursement, contact the grants analyst assigned in the iGrants profile page.

### **BUDGET REVISIONS (2 CFR Part 200.308)**

Unless prohibited by federal or state statute(s) governing a particular grant program, a subgrantee is authorized to increase/decrease expenditures for any budgeted activity total or object total by an amount of up to 10 percent of the total “Budgeted Direct Expenditures” for that grant award ***without submitting a budget revision.***

If a budget revision is required due to exceeding that amount, make sure you allow enough time for the request to go through the approval process in iGrants prior to the claim submission cutoff date. You will not be able to submit your claim until the budget revision is approved.

### **INDIRECT RATES AND CAPS ON ADMINISTRATIVE COSTS**

Some federal programs have maximum limits (statutorily imposed) on administrative costs that can be charged to the grant. For example, Title III, Bilingual, has a statutory cap for administration costs of 2 percent. In prior years, the iGrants system automatically limited the districts indirect rate to 2 percent if the calculated indirect exceeds that amount. Beginning with FY 2017–18, guidance on the Every Student Succeeds Act (ESSA) clarified that the maximum limits only apply to direct administrative charges, so grantees will be entitled to their full indirect rate in addition to the maximum limit on direct administrative activities.

Unless otherwise stipulated in the appropriations act, statute, rule, or by OSPI policy, the following indirect rates for FY 2018–19 apply:

- School district federal grants, contracts, and LAP rates can be found on the School Apportionment & Financial Services main website at <http://www.k12.wa.us/safs/default.asp>.
- School district state grants indirect rates are 7 percent.

- ESD restricted indirect rates for federal grants are 7.38 percent and for state grants 11 percent.

For clarification regarding administrative cost caps and indirect rate information, including information for state universities and colleges, selected state agencies, private universities and colleges, nonprofit organizations, and state-funded projects (other than LAP), please contact Amy Harris, Director, Federal Fiscal Policy & Grants Management at 360-725-6280 or [amy.harris@k12.wa.us](mailto:amy.harris@k12.wa.us).

### **INFORMATION AND ASSISTANCE**

If there are any questions regarding information in this bulletin, unless otherwise specified in the bulletin, please contact Michelle Sartain, Supervisor, Grants Management, at 360-725-6282. The OSPI TTY number is 360-664-3631.

This bulletin is also available on the [Bulletins and Memoranda](http://www.k12.wa.us/BulletinsMemos/bulletins2018.aspx) page of the OSPI website. ([www.k12.wa.us/BulletinsMemos/bulletins2018.aspx](http://www.k12.wa.us/BulletinsMemos/bulletins2018.aspx)).

### **FINANCIAL RESOURCES**

Lisa Dawn-Fisher  
Chief Financial Officer

Amy Harris  
Director, Federal Fiscal Policy & Grants Management

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