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Agora Cyber Charter School

Board of Trustees Policy

FEDERAL FISCAL COMPLIANCE

POLICY

The Board of Trustees (the “Board”) of Agora Cyber Charter School (“Charter School”) shall ensure federal funds received by the Charter School are administered in accordance with federal requirements, including but not limited to the federal Uniform Grant Guidance.

The Board shall review and approve all applications for federal funds submitted by the Charter School.

The Board designates the Business Manager as the Charter School contact for all federal programs and funding.

The CEO or his/her designee, in collaboration with the Federal Programs Coordinator and Business Manager , shall establish and maintain a sound financial management system to include internal controls and federal grant management standards covering the receipt of both direct and state-administered federal grants, and to track costs and expenditures of funds associated with grant awards.

The Charter School’s financial management system shall be designed with strong internal controls, a high level of transparency and accountability, and documented procedures to ensure that all financial management system requirements are met. Financial management standards and procedures shall assure that the following responsibilities are fulfilled:

Identification – the Charter School must identify, in its accounts, all federal awards received and expended, and the federal programs under which they were received.

Financial Reporting – Accurate, current, and complete disclosure of the financial results of each federal award or program must be made in accordance with the financial reporting requirements of the Education Department General Administrative Regulations (“EDGAR”).

Accounting Records – the Charter School must maintain records which adequately identify the source and application of funds provided for federally-assisted activities.

Internal Controls – Effective control and accountability must be maintained for all funds, real and personal property and other assets. The Charter School must adequately safeguard all such property and must assure that it is used solely for authorized purposes.

Budget Control – Actual expenditures or outlays must be compared with budgeted amounts for each federal award. Procedures shall be developed to establish determination for allowability of costs for federal funds.

Cash Management – The Charter School shall maintain written procedures to implement the cash management requirements found in EDGAR. See Attachment.

Allowability of Costs – The Charter School shall ensure that allowability of all costs charged to each federal award is accurately determined and documented. See Attachments.

Procurement – The Charter School has outlined cost thresholds for determining when the quote or formal bidding procedures that are required by state law as reflected in the Purchases Subject to Bid Policy must be modified when making purchases for federally funded purposes to which the Uniform Grant Guidance or USDA regulations apply.
See Attachment.

Standards of Conduct

The Charter School shall maintain standards of conduct covering conflicts of interest and the actions of employees and school officials engaged in the selection, award and administration of contracts.

All employees shall be informed of conduct that is required for federal fiscal compliance and the disciplinary actions that may be applied for violation of Board policies, administrative regulations, rules and procedures.

Employees - Time and Effort Reporting

All Charter School employees paid with federal funds shall document the time they expend in work performed in support of each federal program, in accordance with law. These time-and-effort reporting requirements do not apply to contracted individuals.

The Charter School's CEO or his/her designee will ensure that supporting documentation for this time-and-effort will be maintained for Charter School employees with wages and/or benefits that are related to any combination of a federal award, cost objectives and/or other federal, state or local funding sources. Supporting documentation for Charter School employee time and effort must be sufficient so that costs were correct and appropriately allotted.

All employees paid with federal funds, including any employee whose salary is paid with state or local funds and is used to meet a required "match" in a federal program, must submit either (1) a semi-annual certification or (2) a personnel activity report, as specified below. The type of form depends on the number of programs or cost objectives that an employee works on over the course of a school year. A cost objective is a program, function, activity, award, organizational subdivision, contract, or work unit of which cost data are described and from which provision is made to accumulate and measure the cost of processes, products, jobs, or capital projects. See 2 C.F.R. § 200.28.

All employees who work on a single program or cost objective must complete a semi-annual certification. The semi-annual certification must be: (1) completed at least every six months; (2) be signed by the employee or the supervisor with direct knowledge of the work being performed; (3) reflect an after-the-fact (as distinguished from budgeted) distribution of the actual activity; and (4) account for the total activity for which each employee is compensated.

All employees who work on multiple programs or cost objectives must complete a personnel activity report (see 2 C.F.R. § 200.430) that support the distribution of their salaries or wages that meet the following standards: (1) reflect an after-the-fact (as distinguished from budgeted) distribution of the actual activity; (2) account for the total activity for which each employee is compensated; (3) are prepared semi-annually; and

4. are signed by the employee.

Payroll charges shall match the actual distribution of time recorded on the certification documents. The certifications shall be collected from employees semi-annually and reviewed by each employee's supervisor. If an employee exits the federally-funded program mid-year, the employee's supervisor is responsible for collecting outstanding certifications even though the employee is no longer employed in that role.

Documentation of this will be stored by the Charter School for the required time period (see below for retention procedures).

Charter School employees shall be reimbursed for travel costs incurred in the course of performing services related to official business as a federal grant recipient.

The Charter School shall establish and maintain employee policies on hiring, benefits and leave and outside activities, as approved by the Board.

Record Keeping

The Charter School shall maintain a Records Management Plan and related Board policy and administrative regulations for the retention, retrieval and disposition of manual and electronic records, including emails.

The Charter School shall ensure the proper maintenance of federal fiscal records documenting:

- a. Amount of federal funds.
- b. How funds are used.
- c. Total cost of each project.
- d. Share of total cost of each project provided from other sources.
- e. Other records to facilitate an effective audit.
- f. Other records to show compliance with federal program requirements.
- g. Significant project experiences and results.
- h. All records must be retrievable and available for programmatic or financial audit.

The Charter School shall provide the federal awarding agency, Inspectors General, the Comptroller General of the United States, and the pass-through entity, or any of their authorized representatives, the right of access to any documents, papers, or other Charter School records which are pertinent to the federal award. The Charter School shall also permit timely and reasonable access to the Charter School's personnel for the purpose of interview and discussion related to such documents.

Records shall be retained for a minimum of five (5) years from the date on which the final Financial Status Report is submitted, or as otherwise specified in the requirements of the federal award, unless a written extension is provided by the awarding agency, cognizant agency for audit, oversight agency for audit or cognizant agency for indirect costs.

If any litigation, claim or audit is started before the expiration of the standard record retention period, the records shall be retained until all litigation, claims or audits have been resolved and final action taken.

As part of the Records Management Plan, the Charter School shall maintain a records retention schedule, which shall delineate the record retention format, retention period and method of disposal.

The Records Management Plan shall include identification of staff authorized to access records, appropriate training, and preservation measures to protect the integrity of records and data.

The Charter School shall ensure that all personally identifiable data protected by law or regulations is handled in accordance with the requirements of applicable law, regulations, Board policy and administrative regulations.

Subrecipient Monitoring

In the event that the Charter School awards subgrants, the Charter School shall establish procedures to:

- a. Assess the risk of noncompliance.
- b. Monitor grant subrecipients to ensure compliance with federal, state, and local laws and Board policy and procedures.
- c. Ensure the Charter School's record retention schedule addresses document retention on assessment and monitoring.

Compliance Violations

Employees and contractors involved in federally funded programs and subrecipients shall be made aware that failure to comply with federal law, regulations or terms and conditions of a federal award may result in the federal awarding agency or pass-

through entity imposing additional conditions or terminating the award in whole or in part.

TO THE EXTENT THAT ANYTHING IN THIS POLICY COULD BE CONSTRUED TO CONFLICT WITH THE SCHOOL'S CHARTER AND/OR APPLICABLE STATE AND/OR FEDERAL LAWS, THE APPLICABLE STATE AND/OR FEDERAL LAWS AND/OR CHARTER CONTROL.