

Preface:

This Fiscal Procedure Manual details the financial management system and policies that govern the fiscal operations of Celina City Schools / Mercer County Head Start. The procedures and practices employed are designed to provide the timely, accurate, current, and complete disclosure of financial information while ensuring thorough oversight and protection of Federal grant funds, as required by Federal regulations (45 CFR 74.21 and 92.20).

In essence, a sound financial management system is comprised of accurate accounting records (journals, ledgers, supporting documentation, etc.) together with a series of processes and procedures normally executed by authorized personnel to ensure the integrity of these records. The objectives of the system are to ensure that all economic transactions for which monetary values can be imputed are properly entered into the accounting records and that financial reports necessary for effective management of program funds are prepared accurately and in a timely fashion.

Celina City Schools / Mercer County Head Start are governed by the Celina City Schools Board, which is responsible for the oversight of the organization. Specific guidelines regarding the election, term of office, and duties of the School Board are described in detail in the Organization's Bylaws approved by the Policy Council and Board of Education.

Organizational Structure

Roles of the Governing Body

Celina City Schools / Mercer County Head Start are proud to serve as grantee for the Head Start program for over 40 years. The Board of Education is responsible for the fiscal and legal oversight of the Head Start program. Their commitment to excellence in education is demonstrated through their support of the Head Start program both in time and resources.

Treasurer Office Structure

The positions comprising the Fiscal Department are as follows:

- District Treasurer
- Accounts / Payable / Accounts Receivable - Assistant Treasurer
- Payroll - Assistant Treasurer
- Payroll Secretary

Additional employees providing input into the fiscal operation of the program include:

- Head Start Executive Director
- Governing Board / Policy Council
- District Superintendent

Responsibilities

The primary responsibilities of the Fiscal Department consist of:

- General Ledger
- Budget oversight
- Cash and Investment Management
- Asset Management
- Grants and Contracts Administration
- Accounts Payable
- Accounts Receivable
- Cash Receipts
- Cash Disbursements
- Payroll and Benefits
- Financial Statement Processing
- External Reporting of Financial Information
- Bank Reconciliation
- Compliance with Government Reporting Requirements
- Annual Audit
- Leases
- Insurance

Grant Funds

It is the objective of the Celina City Schools to provide equal educational opportunities for all District students. Government agencies, as well as foundations, businesses, and individuals, periodically offer both human and material resources to the District that benefit students of the educational program. Therefore, it is the intent of the Board to consider grant proposals and applications for their potential to enhance the educational opportunities, the educational environment, and the physical and mental growth for each student.

The Superintendent shall review new Federal education legislation and prepare proposals for programs s/he deems would be of aid to the students of this District. The Superintendent or designee shall approve each such proposal prior to its submission, and the Board shall approve all grants resulting from such proposals.

The Board regards available Federal funds of aid to local school districts and communities as a public trust. It forbids the use of Federal monies for partisan political activities and for any use that would not be in accord with Federal guidelines on discrimination.

20 U.S.C. 7906 No Federal funds received by the Board shall be used to:

- A. Develop or distribute materials, or operate programs or courses of instruction directed at youths, that are designed to promote or encourage sexual activity, whether homosexual or heterosexual;
- B. Distribute or aid in the distribution by any organization of legally obscene materials to minors on school grounds;
- C. Provide sex education or HIV-prevention in schools unless that instruction is age-appropriate and includes the health benefits of abstinence; or
- D. Operate a program of contraceptive distribution in schools.

Grant Proposal Development

- A. All grant proposals must support at least one (1) District goal or priority.
- B. For projects where grant funds will not cover the entire cost of project implementation, additional fund sources must be identified, documented, and approved during the internal review process.

Grant Proposal Internal Review

Each grant proposal shall be reviewed and approved by the Superintendent / Executive Director prior to submission to the funding source.

Grant Administration

- A. The administration of grants will adhere to all applicable Federal, State, and grantor rules and regulations as well as Board policies and administrative guidelines.
- B. The Head Start Director is responsible for the efficient and effective administration of grant awards through the application of sound management practices.
- C. The Head Start Director is responsible for administering grant funds in a manner consistent with underlying agreements, program objectives, and the terms and conditions of the grant award.
- D. The District, in recognition of its unique combination of staff, facilities, and experience, shall employ the organizational and management strategies necessary to assure proper and efficient administration of grant awards.
- E. All Federal funds received by the District will be used in accordance with the applicable Federal law. The Treasurer shall require that each draw of Federal monies is as close as administratively feasible to the related program expenditures and that,

when restricted; such monies are used to supplement programs and funding and not to supplant or replace existing programming or current funding.

- F. The Head Start Director is authorized to sign related documents for grant administration, including documents required for submittal or grant proposals.
- G. Employee positions established through the use of grant funding may terminate if and when the related grant funding ceases.

Additional Program Income

- The USDA Nutritional Assistance Programs provide children and low-income people access to food, a healthy diet, and nutrition education through the Child and Adult Food Care program (CACFP) and disaster assistance. Celina City Schools / Mercer County Head Start will participate fully in the CACFP nutrition assistance program to assure best use of grant funds and provide meals of high quality.

Grant Opportunities

- On occasion, various grant opportunities in support of service delivery through the Head Start program may be available. All funds procured through grants will be utilized in accordance with agency fiscal regulations.

Reimbursement for Participation

- In the event the program or a particular employee is reimbursed for expenses based on full participation in training or similar activity, the funds will be allocated to offset the cost of the employee(s) participation with any remaining funds utilized for the benefit of the children and families.

Business Conduct

Fiscal Personnel Code of Conduct

All member of the Governing Board of Celina City Schools / Mercer County Head Start are required at time of hire or placement to understand and abide by the codes of conduct set forth in the Head Start Act of 2007, Uniform Guidance 200.112, and 45 CFR part 75 (75.112) *Conflict of Interest*.

2 CFR Part 200 / 200.112 Conflict of Interest - The Federal awarding agency must establish conflict of interest policies for Federal awards. The non-Federal entity must disclose in writing any potential conflict of interest to the Federal awarding agency or pass-through entity in accordance with applicable Federal awarding agency policy.

45 CFR Part 75 / 75.112 Conflict of Interest - **(a)** HHS awarding agencies must establish conflict of interest policies for Federal awards. The non-Federal entity must disclose in writing any potential conflict of interest to the respective HHS awarding agency or pass-through entity in accordance with applicable HHS awarding agency's policy. As a general matter, HHS awarding agencies' conflict of interest policies must:

- (1) Address conditions under which outside activities, relationships, or financial interests are proper or improper;
- (2) Provide for advance notification of outside activities, relationships, or financial interests, and a process of review as appropriate; and
- (3) Outline how financial conflicts of interest may be addressed.

642 (c)(1)(C) – Conflict of Interest - (C) CONFLICT OF INTEREST- Members of the governing body shall--

- (i) not have a financial conflict of interest with the Head Start agency (including any delegate agency);

(ii) not receive compensation for serving on the governing body or for providing services to the Head Start agency;

(iii) not be employed, nor shall members of their immediate family be employed, by the Head Start agency (including any delegate agency); and

(iv) operate as an entity independent of staff employed by the Head Start agency.

1. No governing board member, employee, or agent shall participate in the selection or administration of a vendor or contracts if a real or apparent conflict of interest would be involved. Such a conflict would arise if an officer, board member, employee or agent, or any member of his / her immediate family, his / her spouse / partner, or an organization that employs or is about to employ any of the parties indicated herein, has a financial or other interest in the vendor selected.
2. Governing Board members, employees, and agents shall neither solicit nor accept gratuities, favors, or anything of monetary value from vendors or parties to sub-agreements.
3. Employees shall discourage the offer of, and decline, individual gifts or gratuities of value in any way that might influence the purchase of supplies, equipment, contracts and / or services.
4. Employees shall notify their immediate supervisor if they are offered such gifts.
5. Violation of this policy may result in disciplinary action up to and including termination.

Conflict of Interest – Private Practice

The proper performance of school business is dependent upon maintaining unquestionable high standards of honesty, integrity, impartiality, and professional conduct by Board of Education employees. Further, such characteristics are essential to the Board's commitment to earn and keep the public's confidence in the School District / Head Start. For these reasons, the Board adopts the following guidelines to assure that conflicts of interest do not occur. These guidelines are not intended to be all inclusive, nor to substitute for good judgment on the part of all employees.

1. No employee shall engage in or have a financial interest, directly or indirectly, in any activity that conflicts or raises a reasonable question of conflict with his / her duties and responsibilities in the school system / Head Start.
2. Employees shall not engage in business, private practice of their profession, the rendering of services, or the sale of goods for any type where advantage is taken of any professional relationship they may have with any student, client, or parents of such students or clients in the course of their employment with the School District / Head Start. Included, by the way of illustration rather than limitation are the following:
 - a. The provision of any private lessons or services for a fee
 - b. The use, sale, or improper divulging of any privileged information about a student or client gained in the course of the employee's employment or through his / her access to School District – Head Start records.
 - c. The referral of any student or client for lessons or services to any private business or professional practitioner if there is any expectation of reciprocal referrals, sharing of fees, or other remuneration for such referrals.

- d. The requirement of students or clients to purchase any private goods or services provided by an employee or any business or professional practitioner with whom any employee has a financial relationship, as a condition of receiving any grades, credits, promotions, approvals, or recommendations.
- 3. Employees shall not make use of materials, equipment, or facilities of the school district / Head Start in private practice. Examples would be the use of facilities before, during, or after regular business hours for service to private practice clients, or the use of Head Start materials for private practice.
- 4. Exceptions to this policy shall be approved by the Head Start Director and Superintendent before entering into any private relationship.

Internal Monitoring and Self – Assessment

Fiscal Management

The financial management of grant funds shall be in compliance with all applicable Federal, State, and grantor rules, regulations, and assurances as well as Board policies and administrative guidelines.

District Treasurer shall provide for the following:

- A. Accurate, current, and complete disclosure of the financial results of each federally-sponsored project in accordance with the reporting requirements of the grant.
- B. Effective control over and accountability for all funds, property, and other assets in their use solely for authorized purposes.

- C. Record keeping and written procedures as may be required by Federal, State, and grantor rules and regulations pertaining to the grant award and accountability, including such provisions as may be applicable as cost sharing and matching requirements, budget revisions, audit requirements, reasonableness, allocability, and allowability of costs, procurement, property management and disposition, and payment / repayment requirements.
- D. Insurance coverage for real property and equipment, if applicable, equivalent to the coverage obtained for Board – owned property of a similar nature.

Compliance Supplement for Single Audits of State and Local Governments. Reference OMB (Office of Management & Budget) Circular A-133, Compliance Supplement 2016

https://obamawhitehouse.archives.gov/omb/circulars/a133_compliance_supplement_2016

Whistleblower Protection

The Office of Head Start identifies fraud, waste, and abuse of grant funds that include embezzlement, misuse or misappropriation of property, and false statements by organizations or individuals. Celina City Schools Head Start has policies and procedures in place to protect against fraud.

The Board of Education expects all employees to be honest and ethical in their conduct, and to comply with applicable State and Federal law, Board policies, and administrative guidelines.

The Board encourages staff to report possible violations of these Board expectations to their immediate supervisors.

It is the responsibility of an employee who is aware of conduct on the part of any Board member or employee that possibly violates Federal or State law, or Board policy, to call this conduct to

the attention of his / her immediate supervisor. If the employee's immediate supervisor is not responsive or is the employee whose behavior is in question, the employee may report to the Superintendent. If the reported conduct relates to the Superintendent, the report may be filed directly with the Board President.

After such a report is made, the immediate supervisor will ask that employee's report be put in writing. Any employee making such a report shall be protected from discipline, retaliation, or reprisal for making such report as long as the employee made a reasonable and good faith effort to determine the accuracy of any information reported. Employees are subject to disciplinary action, up to and including termination, for purposely, knowingly, or recklessly making a false report under this policy. Conversely, employees are subject to disciplinary action, up to and including termination, if they are aware of a violation of Federal, State, or local law that the Board has the authority to correct and they do not make a report confirmed in writing to their immediate supervisor.

In the case of reporting suspected fraud or fraudulent activity, an employee may file a report using the Auditor of State's system for reporting fraud. This reporting mechanism may be used whether in addition to, or instead of, filing a written report with the employee's supervisor or other District authority.

The Superintendent and Head Start Director shall develop administrative guidelines necessary for implementation of this policy, including the development of forms upon which such reports are made.

Form #1411 F1

District Policy #1411

Records Retention

Celina City Schools Head Start and / or in conjunction with the grantee will maintain all financial records, supporting documents , statistical records, and all other records pertinent to an award, except payroll related, shall be retained for a period of three years from the submission date of the final expenditure report.

If there is any litigation, claim, financial management review, or audit is started before the expiration of the three year period, the records shall be retained until all litigation, claims, or audit findings involving the records have been resolved and final action taken.

All payroll related documents of W-2, W-3, W-4, and payroll journals shall be retained permanently. Auditor's reports, financial reports, tax returns, pension records, the corporation articles of incorporation, bylaws, and the board minutes shall be retained permanently.

Copies of original records may be substituted for the original records if authorized by the HHS awarding agency.

In the event the agency grant period is extended beyond the traditional five year time frame, the record retention policy will be extended by the same time frame.

Reference: Uniform Guidance 2 CFR 200.333

Chart of Accounts

General Ledger

The general ledger is defined as a group of accounts that supports the information shown in the major financial statements. The general ledger is used to accumulate all financial transactions of Celina City Schools Head Start and is supported by subsidiary ledgers that provide details for

certain accounts in the general ledger. The general ledger is the foundation for the accumulation of data and reports.

Reference *United States Standard General Ledger*

Chart of Accounts Overview

The chart of accounts is the framework for the general ledger system, and therefore the basis of the accounting system. The chart of accounts consists of account titles and account numbers assigned to the titles. General ledger accounts are used to accumulate transactions and the impact of these transactions on each asset, liability, revenue, and expense account. Additionally, the use of programs and sub-programs are utilized to properly classify expenses by grant.

CCSHS's chart of accounts is comprised of four types of accounts

1. Assets
2. Liabilities & Fund Balances
3. Revenues
4. Expenses

The program's numbers are coded based upon the department and year in which the program is originally expected to end. This seven number program code is broken down into categories for allocations.

Changes to the Chart of Accounts or Budget

Additions to, deletions from, or any other changes to the Celina City Schools's standard chart of accounts / budget categories shall be completed through communication between the Head Start Director and the Treasurer. The procedures followed when setting up a new fund, or line item in the budget is as follows:

1. The Head Start Director notifies the District Treasurer of a new program or line item that is needed.
2. The District Treasurer reviews the request, reviews USAS codes to establish an entity number, listing the line item, program code, start and end dates, and amount allocated.
3. The Treasurer will notify the Head Start director when the process is completed.

Budget Revision and Emergency Grant Applications

The Policy Council / Governing Board as outlined in the grant application approves the annual budget. The Policy Council also approves the annual continuing grant application, which provides the primary funding for the program, during its normal meeting cycle. In the event that substantial budget revisions are necessary, or additional grant application opportunities are available, provision shall be made to gain timely approval by the Policy Council and Governing Board.

It is the responsibility of the Executive Director or designee to submit substantial budget revisions to the Policy council as soon as any spending variances are known, and before any new substantial new expenditure is made. It is the responsibility of the Executive Director to obtain approval by the Policy Council of any application for Head Start funding.

1. PROCEDURE FOR SUBSTANTIAL BUDGET REVISIONS

- A. Substantial revisions may be brought at any time as needed for the Policy Council to consider.

- B. Spending variances are defined as increases or decreases in the actual cost of a previously approved budget item. A new expenditure is a new cost (personnel, goods, or services) not previously included in the budget.
- C. For the purposes of defining a substantial spending variance or substantial new expenditure, the figure of \$20,000 will be used. Any amounts less than this that are in keeping with performance standards and policies may be made without specific Policy Council Approval.

2. PROCEDURE FOR EMERGENCY GRANT APPLICATIONS

- A. Emergency grant applications are defined as grant opportunities, usually with imminent deadlines, which do not all for the normal procedure for Policy Council approval.
- B. In the event that the Executive Director pursues such a grant application, the Policy council Chairperson, is notified and will call a special Policy Council meeting to approve the grant application.

3. POLICY COUNCIL APPROVAL

In the event that the Policy Council has approved either a substantial budget revision or a grant application, the full Policy Council will consider the matter at its next meeting. In the event that the Policy Council does not approve the budget revision and / or the grant application, the Policy Council and Administrative Team will work together to craft an agreeable alternative.

Fiscal Year

The program fiscal year has been identified through the Office of Head Start at the time of grant award. The fiscal year is December 1 – November 30th of each year until further notice. In the event the fiscal year should change, all federal reporting dates will change accordingly.

Journal Entries**Accounts Payable**

All bills must be paid in a timely manner. Except in the case of approved advanced payments, checks will be cut only after Accounts Payable has received properly approved purchase orders, invoices or receipts, and receiving documentation.

Procedure

1. Once accounts payable has received a properly approved purchase order, invoices or receipts, and receiving documentation (packing slips), then accounts payable will check the documentation for consistency. Accounts payable has the responsibility to verify invoices as to the prices, extensions, additions, freight charges, discounts, taxes not charged, etc.
2. The invoice package goes to accounts payable for computer input. After accounts payable has verified the information, the data is input into the computer. After the data is input, an Invoice Listing report is run and verified to the supporting documentation.
3. Next, cash disbursement checks are printed and signed in the computer. After the checks are printed correctly, the numbers are reviewed to confirm agreements.

4. The checks are then processed. The accounts payable clerk separates the checks and copies, attaches each check copy to the appropriate documentation, and mails the check to the appropriate payee.
5. The yellow copy of the check is attached to the pink copy of the purchase order and the whole invoice package, which is then filed in numerical order in the accounts payable files.
6. Accounts payable cash disbursement runs are done approximately once a week.

Revenues and Cash Receipts

At the end of each month, the Treasurer compiles a report of that month's activity with respect to the Head Start grant. Once compiled, the Treasurer will then access the Payment Management System (PMS) and request the appropriate amount of funds to cover that month's expenses and those obligations outstanding that will be liquidated within 5 days. Funds requested through the payment management system are received via direct deposit the very next day. The Treasurer then prepares a pay – in crediting the funds to the respective Head Start grant.

Expenditures and Disbursements

Procurement and Purchasing

All procurement transactions, regardless of amount, will be conducted in a manner that provides, to the maximum extent practical, open and free competition. The district will advertise to obtain bids from a variety of vendors. In accordance with Board Policy and

State of Ohio Laws, most services or items needed for the program will not be formally bid as they fall well below the amount indicating the need for bids, \$50,000 threshold. For those items that are required to be bid or for items deemed necessary to be bid to obtain the best possible price and vendor commitment, the Board will make every effort to encourage free and open competition among available vendors. General specifications for the item(s) to be bid will be assembled and after obtaining formal approval to bid the specific item(s), a notice to bidders will be published in a newspaper with a circulation in the general area. Additionally, any known local vendors or vendors who have in the past bid on similar items or services that are being bid will be notified with the appropriate bid request information. The bid request information will include the bid deadline, bid (product) specifications and any other requirements (Bid Bond) of the bid process. In developing the bid specifications, the district will abide by the Federal requirements pertaining to procurement contained in CFR 92.36, Board Policy Section 6320, and HSPPS 1303.55.

- (a) A grantee must comply with all grants management regulations, including specific regulations applicable to transactions in excess of the current simplified acquisition threshold, cost principles, and its own procurement procedures, and must provide, to the maximum extent practical, open and full competition.
- (b) A grantee must obtain the responsible HHS official's written approval before it uses Head Start funds, in whole or in part, to contract construction or renovation services. The grantee must ensure these contracts are paid on a lump sum fixed-price basis.
- (c) A grantee must obtain prior written approval from the responsible HHS official for contract modifications that would change the scope or objective of a project or would

materially alter the costs, by increasing the amount of grant funds needed to complete the project.

(d) A grantee must ensure all construction and renovation contracts paid, in whole or in part with Head Start funds contain a clause that gives the responsible HHS official or his or her designee access to the facility, at all reasonable times, during construction and inspection.

Board Policy 6320

6320 - PURCHASES

When the purchase of, and contract for, single items of supplies, materials, or equipment amounts to \$50,000 or more, and when the Board determines to build, repair, enlarge, improve, or demolish a school building the cost of which will exceed \$50,000, the Superintendent/Treasurer shall obtain competitive bids.

In accordance with statute, the Board may elect to forego the bidding for contracts in any of the following situations:

- A. the acquisition of educational materials used in teaching
- B. if the Board elects and declares by resolution to participate in purchase contracts, in accordance with R.C. Chapter 125 and the terms and conditions prescribed by the Department of Administrative Services

C. if the Board determines and declares by resolution adopted by two-thirds (2/3's) of its members that any item is available and can be acquired only from a single source

D. if the Board declares by resolution adopted by two-thirds (2/3's) of its members that the installation, modification, and/or remodeling subject to contracting is involved in an energy conservation measure undertaken through an installment payment contract under R.C. 3313.372 or pursuant to R.C. 133.06(G)

E. the acquisition of computer software and/or computer hardware for instructional purposes

The Superintendent shall verify that the specifications for any public improvement project for which bids are solicited do not require any bidder to:

A. enter into agreements with labor organizations on said public improvement; or

B. enter into an agreement that requires its employees to become members of or pay fees or dues to a labor organization as a condition of employment or continued employment.

Bids shall be sealed and shall be opened by the Treasurer in the presence of at least one (1) witness.

Soliciting of Bids

The Board, by resolution, may award a bid to the lowest responsive and responsible bidder. For a bidder to be considered responsive, the proposal must respond to all bid

specifications in all material respects and contain no irregularities or deviations from the bid specifications that would affect the amount of the bid or otherwise provide a competitive advantage. For a bidder to be deemed responsible, the Board may request evidence from the bidder concerning:

- A. the experience (type of product or service being purchased, etc.) of the bidder;
- B. the financial condition;
- C. the conduct and performance on previous contracts (with the District or other agencies);
- D. the bidder's facilities;
- E. management skills;
- F. the ability to execute the contract properly;
- G. a signed affidavit affirming that neither the bidder nor any sub-contractor has entered into an agreement with any labor organization regarding the public improvement project.

Awarding of Bids

The Board shall approve all contracts resulting from competitive bids prior to being awarded. The Board reserves the right to reject any or all bids.

In situations in which the Board has resolved to award a bid to the lowest responsible and responsive bidder and the low bidder does not meet the considerations specified above, the Board shall so notify the bidder, in writing, by certified mail. The bidder may protest

the award of a bid within five (5) days of the notification and the Board shall meet with the protesting bidder and then reaffirm or reverse its decision.

Limitations

All purchases that are within the amount contained in the fund of the appropriation may be made upon authorization of the Purchasing Agent.

The Treasurer is authorized to adjust appropriations within a fund in order to make necessary purchases and shall report such modifications at the following regular Board meeting.

Then and Now Certificate

If the Treasurer can certify that both at the time of the purchase and at the time of certification, sufficient funds were available or in the process of collection, to the credit of the respective fund, properly appropriated and free from previous encumbrance, the expenditure may be authorized. The Board may approve such payment within thirty (30) days from receipt of such certificate.

Amounts of less than \$3,000 may be paid by the Treasurer upon completion of the "then and now" certificate, provided that the expenditure is otherwise lawful.

The Superintendent is authorized to make emergency purchases, without prior adjustment, of those goods and/or services needed to keep the schools in operation. Such purchases shall be brought to the Board's attention at the next regular meeting.

"Blanket" Certificates

The Treasurer may issue "blanket" purchase orders (certificates) for a sum not exceeding an amount established by resolution of the Board against any specific line item account over a period of time, not to extend beyond the end of the fiscal year in which it is issued. Only one (1) "blanket" purchase order (certificate) may be outstanding at any one (1) particular time for any one (1) particular line item appropriation.

"Super Blanket" Certificates

The Treasurer may issue "super blanket" purchase orders (certificates) for any amount for expenditures and contracts from a specific line-item appropriation account in a specified fund for most professional services, fuel, oil, food items, and any other specific recurring and reasonably predictable operating expense. Such a purchase order (certificate) shall not extend beyond the fiscal year.

Contracts for Development and Improvement of Facilities

All contemplated contracts for professional design services such as from an architect or for construction management shall be in accordance with R.C. 9.33, R.C. 9.333, and R.C. 153.54 et seq.

Lease-Purchase Agreements

Lease-purchase agreements entered into by the Board shall be in accordance with R.C. 3313.375. Such agreements shall be a series of not more than thirty (30) one-year renewable lease terms, after which time ownership is transferred to the Board if all obligations of the Board under the agreement have been satisfied.

Purchases from the State

In accordance with State law (R.C. 4115.31 et seq.), the Superintendent shall purchase products and services which are available from the Ohio Industries for the Handicapped (OIH) when such products or services are needed by the District. The Superintendent is to maintain the current catalog provided by OIH and inform all District personnel who may be purchasing products or services of the catalog's current listings.

Requirements

Before the Treasurer places a purchase order, s/he shall check as to whether the proposed purchase is subject to bid, whether sufficient funds exist in the budget. All purchase orders shall be numbered consecutively.

In the interests of economy, fairness, and efficiency in its business dealings, the Board requires that:

- A. items commonly used in the various schools or units thereof, be standardized whenever consistency with educational goals can be maintained;

B. opportunity be provided to as many responsible suppliers as possible to do business with the School District. To this end, the Treasurer shall develop and maintain lists of potential suppliers for various types of supplies, equipment, and services. Employees may be held personally responsible for anything purchased without a properly-signed purchase order or authorization.

The Board may acquire equipment as defined in law by lease, by installment payments, by entering into lease-purchase agreements, or by lease with an option to purchase, provided the contract sets forth the terms of such a purchase.

Reverse Auctions

It is the policy of the Board to permit the use of a reverse auction to purchase services and supplies whenever it is determined that the reverse auction process will be advantageous to the District (e.g., result in a cost savings to the District). To that end, vendors may submit proposals when competing to sell services and/or supplies in an open environment via the Internet. While the reverse auction process may be used to purchase supplies such as equipment, materials, tangible assets and insurance, the process may not be used to purchase real property or interests in real property. The process may also be used to purchase services such as the furnishing of labor, time, or effort by a person, provided such services do not involve the delivery of a specific end product other than a report, and are not being furnished in connection with an employment agreement or collective bargaining agreement.

The Board will provide notice of the request for proposals and award contracts in accordance with the Superintendent's administrative guidelines. When competitive sealed bidding and/or competitive sealed proposals for the purchase of services or supplies are required by law, purchases made by reverse auction will satisfy such legal requirement.

Procurement – Federal Grants

The Superintendent shall maintain a procurement and contract administration system in accordance with the USDOE requirements (34 CFR 80.36) for the administration and management of Federal grants and Federally-funded programs. The District shall maintain a compliance system that requires contractors to perform in accordance with the terms, conditions, and specifications of their contracts or purchase orders. Except as otherwise noted, procurement transactions shall conform to the provisions of this policy and administrative guidelines (AG 6320).

Bid Competition Practices

Based on the federal standard found in 45 CFR 74.44 grantee agencies must, whenever possible, make positive efforts to use small businesses, minority – owned firms, and women's business enterprises, and should take all of the following steps to further this goal:

1. Make information on forthcoming opportunities available and arrange time frames for purchases and contracts to encourage and facilitate participation by small businesses, minority-owned forms and women's business enterprises.

2. Consider in the contract process whether firms competing for larger contracts intend to subcontract with small businesses, minority-owned firms, and women's business enterprises.
3. Encourage contracting with consortiums of small businesses, minority-owned firms, and women's business enterprises when a contract is too large for one of these firms to handle individually.
4. Use the services and assistance, as appropriate, of such organizations as the Small Business Administration and the Department of Commerce's Minority Business Development Agency in the solicitation and utilization of small businesses, minority-owned firms, and women's business enterprises.

To the extent practicable, all equipment and products purchased with funds should be American-made. Additionally, CCS Head Start will purchase materials using recycled materials when available at reasonable cost.

Davis – Bacon Act

Any construction, renovation or repair of a Head Start facility where the contract for labor exceeds \$2000, will be reviewed and monitored for compliance with Davis Bacon.

1. Prior to the bid process, the project will be reviewed by the Business Manager to determine if Davis Bacon is applicable. This review will include examining the nature of the project and the anticipated contract cost.
2. As needed, the Head Start Director shall contact the Head Start Regional Office in Chicago, Illinois, to request the resources to make an appropriate determination.

3. Once Davis Bacon is determined to apply to a project, the following procedures will apply:

- a. In accordance with federal regulations, obtain federal approval for all construction, renovation, or purchase of facilities to be used for Head start.
- b. Obtain Davis – Bacon prevailing labor rates and fringe benefits for work classifications to be utilized by contractors.
- c. Mention in all advertisements for bids / proposals that work must be done in compliance with Davis – Bacon Act.
- d. Include mention of Davis – Bacon Act in all requests for proposal for construction, renovation or purchase of facilities.
- e. When evaluating proposals or bids, be sure that the contractor / vendor will agree to comply with the Davis – Bacon Act.
- f. Include all required Davis – Bacon clauses (29 CFR 5.5) in all contracts for construction, renovation or purchase of facilities.
- g. Review weekly payroll forms from contractors and subcontractors during all construction or renovation.

Purchase Orders

All expenditures with the exception of petty cash purchases, must follow the Purchase Order process. The following are the procedures for processing purchase orders.

- 1. **PRIOR** to the signing of a contract or having a verbal agreement to purchase supplies or services the program employee must complete a requisition / purchase order.
 - a. Purchase Orders can only be written by a Manager or Director.

- b. Direct service staff are to submit requests for supplies in writing to their direct supervisor.
 - c. Direct service staff are to submit requests for training following the Request for Training Policy.
- 2. The name and address of the service / goods provider must be detailed in the “Vendor” section of the requisition / purchase order.
- 3. Describe as specifically as possible all goods / services being requested. If estimating cost, estimate realistically. Including shipping cost if applicable.
- 4. Forward the completed requisition / purchase order to the Head Start Secretary for input into the district computer-based requisition system (NOASC). After the information has been posted to the system, a printed copy of the requisition will be forwarded to the Director.
- 5. The paper copy of the requisition is then forwarded to the Treasurer’s office of the District for further review.
- 6. After obtaining the District Superintendent’s approval and signature, the requisition is then forwarded to the Treasurer’s office for final review and processing.
- 7. Following determination of available funds the Treasurer will convert the requisition to a purchase order, certify the purchase order, and assign the purchase order number.
- 8. The white copy will be forwarded to the originating program. The white copy may be copied and provided to the vendor if applicable. A blue copy is made to be placed in the PO Binder for Head Start records and tracking. Two copies are kept in the Treasurer’s office. One copy is attached to the bill when payment is made, and one is kept as permanent record of the transaction.

9. Upon receipt of the goods / services or at such time that it is necessary to process a check, the billing document / invoice shall be marked as “OK for payment with the Director’s name and date” with a white copy of the Purchase Order attached and returned to the Treasurer’s office. Following receipt of all required paperwork the payment will be processed.

Credit Cards

The Board of Education recognizes the efficiency and convenience afforded the day to day operation of the District through the use of credit cards under the supervision of the Treasurer. However, credit cards are not to be used to circumvent the general purchasing procedures required by State law and Board of Education policies. The Board of Education authorizes the use of credit cards in the following manner:

1. Prior to the use of credit card a purchase order must be in place to cover the cost of any items that will be incurred on the district credit card.
2. All credit cards issued to and in the name of the District shall be held and supervised by the Treasurer and used only for approved Head start – related activities.
3. The credit card must be secured from the Treasurer’s office by the Director or designee (in the Director’s absence). Credit cards may be used for Head Start – related transportation, reservations, and expenses, conference registrations, and hotel reservation guarantees for program staff.
4. With prior approval of the Treasurer, purchases from vendors who do not accept purchase orders may use credit cards.

5. A report of monthly credit card expenditures is provided to Policy Council and Board of Education.
6. Tips are not considered a reimbursable cost and therefore should not be included on the credit card unless the tip is a condition of obtaining services (i.e. size of group mandates a required tip).
7. Credit card statements are kept on file at the Treasurer's office for reconciliation against receipts prior to release of funds in payment of credit card invoice.
8. Detailed receipts and appropriate form(s) are to be turned in with the credit card to the Treasurer within (5) five business days upon completion of approved use. Failure to turn in receipts and appropriate form(s) to the Treasurer with (5) five business days may result in the charges being deemed unrelated or unsubstantiated. The user is responsible for any unsubstantiated or unrelated purchases.

All credit card expenditures are reported to the Policy Council and the Board of Education on the monthly report.

Charging Cost to Federal Awards

Item	Allowable Costs	Unallowable Costs	Need Approval
Advertising and Public Relations Costs	Advertising solely for recruiting, procurement and disposal of materials and equipment, any PR costs considered part of the outreach effort for the sponsored award, and notices of grant awards and financial matters.	Costs of advertising and public relations events related to fundraising or other organizational activities, or designed solely to promote the organization.	
Advisory Councils	Costs incurred by advisory councils or committees are allowable as a direct cost where authorized by the Federal awarding agency.		
Alcoholic Beverages		Costs of alcoholic beverages are	

		unallowable.	
Audit costs	Costs of audits are allowable if specifically approved by the awarding agency as a direct cost to the award.		
Bad debts		All bad debts are unallowable	
Bid & Proposal Costs	Expenses incurred in obtaining bids and proposals for allowable Head Start projects		
Bonding Costs	Bonding as required by grants and sound business practice		
Communication Costs	Usual communication costs necessary for allowable services and activities	Personal long distance, personal faxes, and personal cell phone calls are unallowable.	
Compensation for personnel services	Allowable		
Contingency Provisions	Self insurance reserves, pension funds, and reserves for normal severance pay are excluded from this category.	Contributions to a contingency reserve or any similar provision made for events the occurrence of which cannot be foretold with certainty as to time, intensity, or with an assurance of their happening are unallowable	
Contributions		Contributions and donations by the organization to others are unallowable	
Defense and prosecution of criminal and civil proceedings, claims, appeals, and patent infringement		In general, costs incurred in connection with any criminal, civil, or administrative proceeding commenced by the Federal Government, or a State, local, or foreign government, are unallowable.	
Depreciation and use allowance	Allowable as compensation for use of buildings, other capital improvements and equipment		If there is an allowability problem, get prior determination
Donations	Resources received as donations are allowable as Federal matching funds only if resources	Donations are not chargeable to grant funds as either direct or indirect costs	

	would be an allowable expense		
Employee morale, health, and welfare costs and credits	Allowable for improvement of working conditions, employer – employee relations, employee morale and employee performance		
Entertainment Costs		Costs of amusements, social activities, ceremonials and incidental costs relating to entertainment such as meals, lodging, rentals, transportation, and gratuities are unallowable.	
Equipment & other capital expenditures	General purpose equipment with 2 year life and acquisition cost of \$5000 or more per unit		Special purpose equipment with a cost of \$5000 or more per unit. All equipment with a cost of \$25,000 or more requires Region V approval
Fines and Penalties	Allowable only when resulting from specific provisions of grant or contract	Fines and penalties are generally unallowable	
Fringe benefits	Fringe benefits in the form of regular compensation paid to employees		
Goods or services for personal use		Costs of goods or services for personal use are unallowable	
Housing and personal living expenses	Allowable as direct costs to sponsored award when necessary for the performance of the sponsored award and approved by the awarding agency	Unallowable as fringe benefit or indirect costs.	Requires prior approval from Region V
Idle facilities – Idle capacity	Idle capacity is generally allowable for normal costs of operations	Idle facilities are generally unallowable	
Insurance and indemnification	Generally allowable in amounts necessary per grant or contract and good business practice. At the present time insurance policies include, but are not limited to general & child liability, building, vehicle, and bonding		

	insurance		
Interest, fundraising, & investment management costs	Interest in debt incurred after 6/1/98 to acquire or replace capital assets (including renovations, alterations, buildings, equipment, land, and capital assets acquired through capital lease) is allowable	Costs of organized fund raising, costs of investment, counsel to enhance income from investments and costs incurred for interest on borrowed capital prior to 6/1/98 are all unallowable.	
Labor relations costs	Cost incurred in maintaining satisfactory relations between the organizations and its employees are allowable		
Lobbying	Providing a factual presentation on a topic directly related to the performance of the grant	Any attempt to influence the outcomes of elections and legislative activities	
Losses on other awards		Any excess of costs over income on any award is unallowable as a cost of any other award	
Maintenance / repair costs	Allowable as necessary to maintain operating conditions	Costs incurred for improvements, which add to the permanent value or intended life of the buildings and equipment are capital expenditures	Capital expenditure over \$25,000 require prior approval from Region V
Materials and supplies	Usual and necessary agency and program supplies are allowable		
Meetings – Conferences	Generally allowable when usual and necessary		
Memberships, subscriptions and professional activity costs	Generally allowable when incurred in the organization's name and interest	Subscriptions and memberships in an individual's name are unallowable	Costs of membership in any civic or community organization are allowable with prior approval from Director and Region V
Organization Costs			Expenditures in connection with establishment or reorganization are unallowable except with approval from Region V.
Overtime, extra-pay shifts, multi – shift premiums			
Page charges in professional journals	Allowable as a necessary part of research costs specific to the grant		
Participant support costs	Allowable as required by grant or contract		Participant support costs require prior approval

Patent costs	Costs of preparing disclosures, reports, and any other documents required by the award		
Pension plans	Allowable – SERS retirement plan		
Plant and homeland security costs	Allowable as necessary to comply with Government security requirements and safety procedures.		
Pre-award costs		Generally unallowable, but allowable with restrictions and prior approvals.	Allowable only if they would have been allowable if incurred after date of the award and only with prior approval from Region V.
Professional services costs	Costs of professional and consultant services rendered by persons possessing specific skills and who are not employees or officers of the organization are allowable.	Unallowable if contingent upon recovery of costs from Government.	
Profit & losses on disposition of depreciable property of other capital assets	Allowable as a charge or credit to the grant, depending on circumstances.		
Printing and Publishing Costs	Allowable as direct costs to benefiting activities of the organization		
Rearrangements and alteration costs	Allowable when incurred for ordinary or normal rearrangement and alteration of facilities		
Reconversion costs	Allowable to restore facilities to condition prior to start of program		
Recruiting Costs	Allowable costs of “help wanted” advertising	Advertising that includes color or is excessive in size	
Relocation costs	Allowable, with restrictions, when relocation is required by a permanent change in duty assignment		
Rental costs	Allowable, subject to fair market value		
Royalties and other costs for the use of patents and copyrights	Generally allowable		
Selling and marketing		Generally unallowable	Only allowable as direct costs, if necessary to the performance of the award. Requires prior

			approval from Region V.
Severance pay	Allowable to the extent required by law, employer – employee agreement, established policy, or special circumstances of employment.		
Specialized service facilities	The costs of services provided by highly complex or specialized facilities are generally allowable.		
Taxes	Taxes an organization is required to pay are generally allowable. Refunds must be credited as a cost reduction.	Taxes for which exemptions are available to the organization are unallowable	
Termination costs	Generally allowable	Costs continuing after termination due to neglect of agency are unallowable.	
Training and Education Costs	Generally allowable when designed to increase specific, on-the-job skills		
Transportation costs	Allowable pertaining to freight, express, postage charges relating to goods purchased for business purposes		
Travel Costs	Allow within SERS travel policies and procedures, including expenses for transportation, lodging, subsistence, and related items as specified in policies and procedure.	The difference in cost between 1 st class and economy air travel is unallowable, except when economy travel is not available to meet mission requirements	Foreign travel requires prior approval from Region V.
Trustees	Travel and subsistence costs of trustees or directors, as provided in Travel costs.		

Insurance and Bonding (1303.52)

CCSHS will carry reasonable amounts of student accident insurance, liability insurance for accidents on the premises, and transportation liability insurance. All employees responsible for

disbursing funds will be bonded. An Ohio School Plan Certificate of Coverage will be provided for off-site classrooms as requested.

Limitation on Cost of Development and Administration

Cost for the development and administration of CCSHS will not exceed 15% of the total operating budget of any fiscal year. Cost related to the overall management of the program including personnel and non-personnel will be tracked to assure compliance with allowable cost.

Development and Administrative Costs include, but are not limited to:

- Planning, coordination and direction; budgeting, accounting, and auditing; and management of purchasing, property, payroll, and personnel
- Salary of the Executive Director, Salary of the Head Start Director, other expenses related to administrative staff, such as :fringe benefits, travel, transportation, and training.
- Expenses related to bookkeeping and payroll services, audits, cost of insurance, supplies, copy machines, postage, and utilities and operating and maintaining space (to the extent that they support development and administrative functions).

Program budget allocations will indicate “development and administrative costs” or “program” cost on the budget summary worksheets.

Budgeting

Development and Approval

The Head Start Director with the assistance of the management team and final approval of the Policy Council and the Board of Education is responsible for the development of the budget.

The total award amount is determined by the Notice of Award authorized by the Office of Head Start through the Department of Health and Human Services. The Director will ensure that all aspects of the program grant have ample funding allocated to cover the requirements dictated by

the grant. The Director along with the management team must demonstrate the foresight for any possible costs and allocate funds as such. Once the annual budget is completed, it will be taken to Policy Council and Board of Education for approval prior to the submission of the grant.

Monitoring

The Director will review the budget on a regular basis with the Treasurer and Assistant Treasurer. Likewise, the Director will review the budget on a regular basis with the management team during management team meetings. Monthly, the Treasurer provides the Director with a budget report. The Director then provides this report to the Policy Council and inserts the budget report into the Monthly Director's Report for the Board of Education.

Modifications and Revisions

In the event that there would be an instance in which a budget modification would need to occur, the Director will seek guidance from the Region V office. In most cases in which a modification needs to occur from one line item to a related line item, no prior authorization or guidance is required by the Region V office. Any and all budget modifications will be discussed by the Director with the management team and then approved by the Policy Council and Board of Education.

Employee Time Records

To ensure the district's compliance with the record keeping requirements of the Fair Labor Standards Act and the Head Start Act, all employees will complete a daily time record indicating actual time(s) worked daily. The Time Log will be signed by the employee's immediate supervisor and forwarded to the Treasurer's office. Time worked above and beyond normal

contracted work time must also be recorded on a separate time sheet, signed by the immediate supervisor, and forwarded to the Treasurer's office for processing to proper program code, and payment. All Administrative employees are exempt from completing a FSLA time log or time sheet. However, any employee whose position is funded by more than one source must complete a record of time and effort illustrating allocation of time and responsibility.

A time sheet must be completed when working any time above and beyond the contracted number of hours. The immediate supervisor must give approval **PRIOR** to an employee working additional hours.

1. Time sheets must indicate the time period and total number of hours worked to the nearest quarter hour. Example: 9:00 – 11:15 = 2 ¼ hours
2. The completed time sheet must be approved by the immediate supervisor or his / her designee prior to being submitted to the Treasurer's office for program code and payment.
3. Agency payroll is processed twice monthly. In the event that an employee works hours above and beyond their contracted number of hours the employee is responsible for completing a time sheet and submitting to supervisor within the required time frame.
4. Time sheets for each two – week pay period are due in the Head Start office no later than Friday, at 10 a.m., of the week immediately preceding the next pay day or at least 5 days prior to the next pay date. Time sheets that are late, missing, incomplete, improperly completed will be returned to the employee for correction / approval and submitted for payment during the next pay period.

Reimbursable Expenses

Mileage

Agency vehicles are available for employee use during the performance of official business.

In the event that an agency vehicle is not available, the employee should obtain approval from their supervisor before accumulating mileage cost.

Employees are eligible for automobile mileage reimbursement for use of their personal vehicles during the performance of official agency business such as home visits, training events, meetings, etc. An approved purchase order must be completed in advance of incurring any reimbursable mileage. A mileage reimbursement form must be completed and approved by the supervisor prior to submission for reimbursement.

Petty Cash

Each classroom is allocated \$150 for petty cash purchases. Petty cash purchases are to cover those items that cannot be obtained through a vendor (Discount School Supply, Lakeshore, etc.) Items for cooking are permissible. Candy, pop, and gum are not permissible for purchase for classroom activities. Petty cash purchases cannot total more than \$15.00 per receipt, per vendor, per day.

All purchases including those made through the use of petty cash are allocated and coded to the proper program and category code on the annual budget and must be supported with an approved purchase order. Petty cash does not cover any taxes.

Items over the cost of the approved "petty cash" amount should be requested through the use of requisition / purchase order. The requisition must be approved by immediate supervisor prior to being forwarded to the Director for coding to the appropriate program and category.

The Head Start Secretary is responsible for the processing of petty cash. The Head Start Secretary shall not process any petty cash request without the written approval of the Head Start Director. The Head Start Director receives the petty cash request from one of the three managers who approved the initial request from a staff member.

General Inventory

An updated inventory will be maintained in the central office by the Head Start Secretary. A Master Inventory and Department Inventories will be maintained in the fiscal office.

Federal and State regulations define capital equipment as an article of tangible personal property that has a useful life of more than two years, and an acquisition cost of \$5000 or more. In order to maintain quality, assure the protection of valuable resources and to give a basis for sound decision making, an accurate and current inventory of all equipment and supplies will be maintained.

Education staff will complete a classroom inventory of selected consumables prior to submitting a start – up order for the following school year. In an effort to limit liability all classroom technology items are to be collected at the end of the school year, and stored in the main office over the summer months.

Capital Equipment

Any single item with a value of \$5000 or greater is considered capital equipment.

1. Once the item has been purchased or donated, assign the item an inventory number.
This number is on a preprinted inventory label attached directly to the item.
2. The item will be listed and identified by number on the District Inventory Control Sheet.

3. The inventory number is to be conspicuously written and retained in the District Treasurer's inventory file.
4. No less than every two years, the Treasurer's Office will coordinate a physical inventory of capital equipment and the results will be reconciled with the Inventory Control Sheet. The inventory will verify the item's existence, the current utilization and condition, and the continued need for the equipment.
5. All inventory records are maintained in accordance with federal regulations that state that the following information shall be included:
 - A description of the equipment, including manufacturer's model number, if any exists.
 - An identification number, such as the manufacturer's serial number, VIN, or assigned inventory number.
 - Identification of the grant under which the grant was acquired.
 - Information indicating the federal share of the equipment.
 - Acquisition date and unit acquisition cost.
 - Location, use, and condition of the equipment
 - All pertinent information on the ultimate transfer, replacement, or disposition of the equipment
 - At the end of the year, compile a list of "additions" for the Auditor to verify during the annual audit
6. Where capital equipment is to be sold and the Federal Government is to have a right to part of all of the proceeds (if FMV is greater or equal to \$5000), selling procedures

shall be established which will provide for competition to the extent practicable and result in the highest possible return.

- Before a capital equipment item can be disposed of, written approval needs to be received from the Regional Office.
- The inventory record will reflect “disposed” in the location area and the disposition date will be added in the final column.
- At the end of the year, a complete list of “disposals” will be available for review upon request.

Non-Federal Share or In-Kind 45 CFR 92.24(c)(1)

Volunteer Services – Unpaid services provided to a grantee by individuals will be valued at rates consistent with those ordinarily paid for similar work in the grantee’s organization. If the grantee does not have employees performing similar work, the rates will be consistent with those ordinarily paid by other employers for similar work in the same labor market. In either case, a reasonable amount for fringe benefits may be included in the valuation. Time spent by a parent working in the classroom is allowable because a service is being provided to the program.

Hourly rate for classroom volunteers –

Head Start Teacher Assistant (hourly rate of pay as designated by salary scale + 60% fringe benefit costs)

Hourly rate for cafeteria volunteers –

Head Start Cafeteria Aide (hourly rate of pay as designated by salary scale + 60% fringe benefits costs)

Examples of parent / community volunteer activities:

- ✓ Tri – Star ECE Career Compact Students in center base classrooms

- ✓ Community Volunteers assisting in center-based classroom
- ✓ Parents – time spent completing at-home educational activities designed for parent / child engagement. The activity is part of the program curriculum and the activity sheet includes details regarding school readiness goals and TSGold components addressed through the activity. Parents track time spent, observations, and suggestions for future activities.
- ✓ Parents, Community Volunteers assist with recruitment / enrollment activities. Including: posting / delivering recruitment posters and fliers.
- ✓ Parents as teaching assistants in the classroom. A volunteer handbook is provided, and signs describing methods for supporting children are displayed in each learning center in the classroom to further assist the volunteer equate to an allowable cost that would be purchased from a consultant or other individual or provided by a salaried person.
- ✓ Local Community multi – disabled students operate dishwasher, and oversee packaging and processing of recycled materials, eliminating this cost from local Refuse services.
- ✓ Local Church members provide evening story hour, assemble art supply packets for parents, participate in Family Game Night, etc.
- ✓ Community members volunteer in the classroom, interact with children.

Examples of Professional Volunteers and Rate:

- ❖ Speech Therapist – Services provided by Celina City Schools / Mercer County Education Service Center at no cost to Head Start – (salary & fringe as documented by respective payroll office)
- ❖ Maintenance Personnel – Actual rate paid by District as documented by District payroll office, or business completing the maintenance

- ❖ Contracted property maintenance – Full cost paid by Celina City Schools, service is required for Head Start program, therefore Head Start funds would be used to cover the cost of the service if not paid by the Celina City Schools.
- ❖ Policy Council - Director's hourly salary and fringe benefit amount
- ❖ Board members – Superintendent's hourly salary and fringe benefit amount
- ❖ Mental Health Consultant – Difference between discounted hourly rate and actual rate charged to public
- ❖ Ohio State Extension Office – Nutrition Education Specialist – amount identified by OSU provider

Additional Community Volunteers: If rate is not known, the volunteer will complete an in-kind donation by or from the indicating their hourly rate of pay including fringe (suggest 40% of base, if they are unsure of fringe amount). Past donations include: vision screenings, training for parents and staff (budget class, meal planning, relationships / communications, early childhood, etc.).

Goods and Services

Training and Technical Assistance – Training for staff / parents – The rate typically charged by the professional for the service if provided to the agency free of charge. The difference between the rate charged and the normal rate if service provided at a discount. Proof of rate of service is documented.

Professional Development – The difference between the usual and customary charge for professional development services and the actual amount charged to the agency or agency personnel will be calculated as in-kind. Proof of rate of service is documented.

Donated supplies – Fair market value of the item. The item must be used within the operation of the program, and reasonable and customary for the operation of the program. Example: clothing used in the operation of the program, books for lending library, art supplies, office supplies

Support Services – Speech services, custodial services, maintenance services, grounds care / snow removal, all provided at no cost to the agency. Salary and fringe amount provided by the District payroll office used for calculation of cost, allocated by the hour if indicated.

Special Education Teachers – In support of children with an IEP, Mercer County Education Service Center provides special education services at no cost to Head Start. The full implementation of the Consultative Model as well as the Co-teaching Model are in effect.

Actual salary and fringe cost paid by ESC times the number of hours spent in direct student services.

Space

District building(s) usage includes actual cost incurred and covered by District for building utilities including: telephone, internet, electric, gas, sewage, trash, water treatment, etc.

In-Kind Collection and Reporting

All employees of Mercer County Head Start are responsible for obtaining and recording in-kind contributions.

Completed documentation forms are to be submitted for review and data processing by the 5th of each month. The Family Engagement Services Manager will review the form for completeness and accuracy prior to Head Start Secretary entering into the COPA software system. The monthly Non-Federal match tracking form is completed by the FESM indicating NFM amount per category for each month.

The monthly in-kind tracking form is reviewed with the Head Start Director. Information is entered on any necessary reports, and maintained on file for future review.

Non-federal match amount and percentage of total required amount is shared with policy council and governing board on a monthly basis. Non-federal match contributions are shared with staff and families as well.

Financial Reporting Schedule

Process or Report	Receiving Office	Due
Annual T/TA Plan		Due with refunding application
Annual refunding application including Grant Application Budget Instrument (GABI)	Regional Office	Due 90 days before the start of the new budget period
SF – 425, Federal Financial Report, three per budget period	Office of Grants Management	See Program Instruction for specific due dates. Confirm dates with Grants Management Specialist
SF – 425, Federal Financial Report Items 10 a – c	Payment Management System	This monitors cash advances as processed through PMS. Speak with OGM.
Performance Progress Report	OHS Regional Office	Monthly Reports
Annual A-133 audit	Federal Audit Clearinghouse & Regional Office	No later than 9 months after the end of the audit period (grantee's corporate fiscal year)
Program Information Report (PIR)	OHS – electronically through HSES	August 31
End of Month Report	HSES	The 7 th of every month
Grantee Contact information, Center information	HSES	Any time there is a change
Annual self – assessment and Improvement plan	Grantee, Regional Office	Due with refunding application
Community Assessment	Grantee, Regional Office	Once every 5-year grant cycle and updated annually
Annual Report	Public	Annually
School Readiness Child Assessment	Grantee	3 times per year
Certification of compliance with all applicable health and safety requirements	Regional Office (OHS)	Due in year 1 of grant cycle, within 15 days of completion of Health and Safety Assessment at start of 5-year

		project period (see attachment 2 of NOA)
Governance and Leadership Capacity Screening	Grantee	Complete in Year 1 within 90 days of start of 5 year project period (Attachment 2 to NOA does not require that it be submitted to OHS)