



**Federal Programs Policies and Procedures
2025-2026**

Dr. Sandy D. Reid, Superintendent

Contents

Allowability 200.302(b)(7); 200.403(c).....	3
Procurement Standards 200.318(a)	10
Conflict of Interest Policy 200.318(c)	10
Competition 200.319(d)	12
Methods 200.320	14
Methods for Collection, Transmission, and Storage of Yostion 200.336	16
Compensation – Personal Services 200.430(a).....	18
Time and Effort Policy 200.430(a).....	18
Stipends Policy – Georgia State Board Rule 160-3-3-.04	20
Fringe Benefits Policy 200.431	22
Employee Health and Welfare Costs Policy 200.437	23
Participant Support Costs 200.456	24
Travel Costs Policy 200.475; OCGA §50-5B-5; Financial Management for GA LUAs Chapter 40	26
Equipment Management 200.313(d)	28
Federal Payment 200.302(b)(6); 200.305	32

Allowability 200.302(b)(7); 200.403(c)

Vidalia City School System (VCSS) maintains written procedures for determining the allowability of costs charged to Federal awards in accordance with 2 CFR Part 200, Subpart E and the terms and conditions of each Federal program award. These procedures ensure that all expenditures are reasonable, necessary, allocable, properly documented, and consistently treated in accordance with Federal, State, and local requirements.

All costs must be allowable under the federal cost principles in 2 CFR Part 200, Subpart E, and under the terms and conditions of the specific federal award. Expenditures must be aligned with budgeted items in the approved grant application. Certain changes or variation from the approved budget and grant application need prior approval from the GaDOE.

In order to ensure that the district adheres to the guidelines expressed in 2CFR 200, the district uses the procedures below:

- The Federal Program Directors provide guidance to principals regarding what is considered a necessary, reasonable, and **allocable** expense.
- Principals are reminded that their school data must drive their schoolwide plans and schoolwide plans must drive their budgets.
- Principals, with their leadership teams, analyze data and conduct needs assessments of their schools.
- The data that they collect are included in both the schools' schoolwide plans and the district's CLIP.
- The CLIP and the schoolwide plans are submitted to the Federal Programs Director. The Federal Programs Director and Superintendent review the plans; provide feedback to the principals (including needed revisions); and submit the completed plans to the department of education.
- After having approved plans, principals, with guidance from District office as needed, begin developing budgets.
- The Federal Program Directors review the budgets to ensure that all budgeted items were also included in the CLIP and schoolwide plans and that the items meet federal guidelines.

Factors Affecting Allowability of Costs

In general, staff must consider the following elements when determining the allowability of a cost. In accordance with the federal cost principles, all costs budgeted and charged to a federal grant must be:

- Federal expenditure of funds must meet the clause of “**reasonable and necessary.**”

When considering a purchase with federal funds, one must ask:

- Do I really need this?
- Do I need to spend these funds to meet the purposes and needs of the program?
- Do I have the capacity to use what I am purchasing?
- Did I pay a fair rate and can I prove it?
- Would I be comfortable defending this purchase?
- Is the proposed cost consistent with the underlying needs of the program?
- **Allocable to the federal award.** A cost is *allocable* to the federal award if the goods or services involved are *chargeable* or *assignable* to the federal award *in accordance with the relative benefits received* (2 CFR §200.405(a)). The cost is allocable when the following is met.
 - Incurred specifically for the federal award
 - Necessary and Reasonable
 - Adheres to period of performance
 - Avoid conflict of interest
 - Incurred during approved budget period/fiscal year of the budget
 - Meets Supplement not supplant requirements (Except in the case of CARES, CRRSA, ARP grant awards)
 - Aligned with program purpose and the LEA’s prioritized needs outlined in the SIP and CLIP
 - Allocable to federal program as referenced in 2CFR, Part 200.420-200.475
 - Benefits both the federal award and other work of the non-federal entity and can be distributed in proportions that may be approximately using reasonable methods
- **Consistent with policies and procedures-** The cost must be consistent with policies, regulations, and procedures that apply uniformly to both federal awards and other

activities of the governmental unit (2 CFR 200.403 (c)). Federal funds cannot be subjected to different rules than it applies to nonfederal funds.

- **Conform to any limitations or exclusions-** All conditions imposed by the federal government must be met. The cost must conform to any limitations or exclusions set forth under EDGAR, the cost principles, other federal laws, terms and conditions of the federal award, other governing regulations (2 CFR 200.403(b)).
- **Authorized or not prohibited under State or local laws and regulations-** The cost in questions must be allowable under state, local, in addition to federal laws. Federal funds cannot be expended to undertake an activity for which it does not have the authority under its own state or local law or which would constitute an illegal purpose. State and local laws or regulations must authorize or at a minimum, not prohibit the cost in question.
- **Consistent treatment-** If a cost is assigned as a direct cost in one federal award, it cannot be assigned as an indirect cost if for the same purpose in another award.
- **Adequately documented-** All expenditures are properly documented with original source documentation that is clearly written and maintained on file electronically with accounting department. Documentation includes purchase orders/requisitions, invoices, receipts, verification of receipt of goods and services, travel authorizations and vouchers, contracts, time-and-effort records, copies of checks, bank statements, etc. Expenditures that are not supported by source documentation cannot be charged to the grant.
- **Determined in Accordance with GAAP-** Unless otherwise provided for under the cost principles, every cost be determined in accordance with generally accepted accounting principles (2 CFR 200.403 (e)).
- **Not included as a match or cost-share-** If a cost is supported with federal funds, it generally cannot be counted toward a matching or cost-sharing obligations, unless the specific federal program authorizes federal costs to be treated as such (2 CFR 200.403(f)).
- **Adequately Documented-** All costs must be adequately documented (2 CFR 200.403 (g)). EDGAR requires that documentation be maintained to show compliance and performance. All expenditures must be properly documented with original source

documentation that is clearly written and maintained on file (either electronically or on paper) with accounting records. Documentation includes purchase requisitions/orders, invoices, receipts, verification of receipt of goods and services, travel authorizations, contracts, time-and-effort records, copies of checks, bank statements, etc. Expenditures that are not supported by source documentation cannot be charged to the grant.

- **Applicable Credits-** The term “applicable credits” refers to those receipts or reduction of expenditures that operate to offset or reduce expense items allocable to the federal award (examples: purchase discounts; rebates or allowances; and adjustments of overpayments or erroneous charges, such as credits). If this occurs, the credits will be credited to the federal award. 2 CFR §200.406.

2 CFR Part 200’s cost guidelines must be considered when federal grant funds are expended. Federal rules require state and district level requirements and policies regarding expenditures be followed as well. For example, state and/or district policies relating to travel or equipment may be more restrictive than the federal rules. In this case, the stricter state and/or district policies must be followed.

The Federal Program Directors and program coordinators ensure that all **(Title I, Title II, Title III, Title IV, Title V-B, McKinney-Vento, IDEA, Title IX)** conform to any limitations or exclusions set forth in these principles or in the Federal award as to types or amount of cost items.

Requesting Prior Written Approval

When required by Federal regulations or GaDOE guidance, the district secures prior written approval before incurring the cost. The Program Director and Chief Financial Officer determine when prior approval is necessary. Federal funds will not be expended for costs requiring prior approval unless such approval has been obtained.

In summary, for a cost to be allowable under a federal grant program, the district ensures that it meets all of the following conditions. A cost that does not meet all of these conditions could be questioned during an audit or monitoring visit and could require repayment to the awarding agency. The cost must be:

- ❖ *reasonable* in cost (as described above)
- ❖ *necessary* to accomplish the objectives of the grant program (as described above)
- ❖ based on an identified need, concern, or area of weakness within the grant program
- ❖ documented as evidence-based
- ❖ appropriate under the authorizing program statute
- ❖ consistent with the underlying needs of the program in that it benefits the intended population of students or teachers for which the funds are appropriated
- ❖ *allocable* to the grant based on the relative benefits received (as described above)
- ❖ authorized or not prohibited under state or local law or regulations
- ❖ consistent with policies, regulations, and procedures that apply to all activities, including other grants and state and local activities
- ❖ treated consistently as either *direct* or *indirect* cost
- ❖ determined in accordance with GAAP
- ❖ not used to meet cost sharing or matching requirements of another federal grant (unless specifically permitted in the other program statute or regulations)
- ❖ consistent with the terms and conditions of the grant award
- ❖ incurred during the approved budget period
- ❖ budgeted in the approved grant application and grant period
- ❖ Avoids conflicts of interest
- ❖ adequately documented with appropriate supporting original source documentation
- ❖ the net of any applicable credits such as rebates or discounts
- ❖ allowable under the federal cost principles
- ❖ in most cases, supplemental to the core foundation program of the school and to other activities normally conducted by the school (Refer to page 14 for supplement not supplant)
- ❖ if the school is a Title I schoolwide program, the grant program's activities and applicable costs must be included in the schoolwide plan, the school must have conducted a comprehensive needs assessment, and the plan must contain the required components specified in statute (see Title I, Part A §1114[b]).

District personnel responsible for spending federal grant funds and for determining allowability must be familiar with the Part 200 selected items of cost section. District employees are

required to follow these rules when charging these specific expenditures to a federal grant. In addition to checking the selected items of cost in Part 200, district staff must check costs against GaDOE's Guidelines Related to Specific Costs, local district policy, and any grant program restrictions to ensure the cost is allowable.

With each requisition/purchase order, Vidalia City School System has a built-in multiple approval process in the Yoss financial system that includes the program/grant manager and fiscal staff. Each approval level views the request for reasonable, necessary, allowable and allocable before approval is granted.

Costs That Require Special Attention

In addition to the aforementioned, certain types of costs may be allowable under federal law but may not be allowable under state law or guidelines, or may only be allowable under certain circumstances and conditions. GaDOE's General Guidelines for the Use of Title I Funds and Equipment outlines several other types of costs that require special attention due to the fact that some costs frequently cause audit exceptions or monitoring findings.

Vidalia City School System makes every effort to comply with these guidelines in the expenditures of federal grant funds to avoid audit exceptions. District employees engaged in federally funded activities are required to consult this document regularly and be familiar with its contents. When applicable, the program/grant manager will coordinate with the finance department before any expenses requiring special attention is expensed and will together consult the guideline related to specific costs.

The state and/or district rules related to some specific costs items are discussed below. District employees must be aware of these State and District rules and ensure they are complying with these requirements.

Financial Management System and Internal Controls

In accordance with 2 CFR §200.302, VCSS maintains a financial management system (Yoss & PC Genesis) that provides effective internal controls over Federal funds. The system ensures:

- Identification of Federal awards and funding sources

- Accurate, current, and complete disclosure of financial results
- Budget control to prevent overspending
- Written procedures for determining allowability of costs
- Separation of duties between program and fiscal staff
- Multi-level approval prior to obligation and payment

All Federal expenditures are subject to review by the Program Director and Finance Department prior to obligation to ensure compliance with Federal cost principles and approved grant applications.

Documentation and Record Retention

All Federal expenditures must be adequately documented in accordance with 2 CFR §200.403(g). Documentation includes, as applicable:

- Approved grant application and budget
- Purchase requisitions and purchase orders
- Contracts and agreements
- Vendor quotes or bids (when required)
- Invoices and receipts
- Proof of receipt of goods/services
- Time and effort documentation
- Travel authorizations and reimbursement forms
- General ledger reports

Financial documentation is maintained within the YOSS and PC Genesis accounting system and supporting documentation is maintained electronically or physically by the Finance Office and Federal Programs Office.

In accordance with 2 CFR §200.334, records are retained for a minimum of five (5) years after submission of the final expenditure report, unless audit findings, litigation, or monitoring requires extended retention.

Procurement Standards 200.318(a)

Conflict of Interest Policy 200.318(c)

Vidalia City School System (VCSS) maintains written standards of conduct covering conflicts of interest and governing the performance of its employees, officers, agents, and board members engaged in the selection, award, and administration of contracts supported by Federal funds. These standards are established in accordance with 2 CFR §200.318(c) and apply to all Federal awards.

Definition of Conflict of Interest

A conflict of interest exists when an employee, officer, agent, or board member, any member of their immediate family, their partner, or an organization that employs or is about to employ any of the parties indicated herein, has a financial or other interest in or a tangible personal benefit from an entity considered for a contract.

A conflict may be real or apparent. An apparent conflict of interest exists when circumstances could cause a reasonable person with knowledge of the relevant facts to question the individual's impartiality in the procurement process.

Prohibition on Participation

No employee, officer, or agent may participate in the selection, award, or administration of a contract supported by a Federal award if he or she has a real or apparent conflict of interest.

Gratuities, Favors, and Gifts

An employee, officer, agent, or board member of VCSS may neither solicit nor accept gratuities, favors, or anything of monetary value from contractors, potential contractors, or parties to subcontracts supported by Federal funds.

For purposes of this policy, an unsolicited gift of nominal value is defined as an item with a fair market value of \$25 or less that is not cash or a cash equivalent and that is not provided in exchange for influence or favorable treatment. Cash, gift cards, travel benefits, meals, entertainment, or other items exceeding nominal value are strictly prohibited.

Disclosure Requirements

Employees, officers, agents, and board members must disclose in writing any potential or actual conflict of interest to the Superintendent and Chief Financial Officer immediately upon becoming aware of the potential conflict.

Individuals with a disclosed conflict shall not participate in discussions, evaluations, recommendations, voting, or decision-making related to the procurement in question.

Relationships with Parent, Affiliate, or Subsidiary Organizations

If an employee, officer, agent, or board member has a relationship with a parent, affiliate, or subsidiary organization of a vendor or contractor, and such relationship may impair or appear to impair impartiality, the individual must recuse themselves from the procurement process. The district will ensure an independent review and evaluation of the procurement action to maintain objectivity and fairness.

Disciplinary Actions for Violations

Violations of this Conflict of Interest Policy may result in disciplinary action consistent with district personnel policies and applicable law. Disciplinary actions may include, but are not limited to:

- Written reprimand
- Suspension without pay
- Termination of employment
- Removal from board position, where applicable
- Referral to appropriate legal authorities when required

VCSS will take appropriate corrective action if a conflict of interest is identified, including voiding or terminating a contract where permissible and necessary to protect the integrity of the procurement process.

Competition 200.319(d)

Vidalia City School System (VCSS) conducts all procurement transactions in a manner providing full and open competition consistent with 2 CFR §200.319. The district maintains written procedures to ensure that procurement actions are conducted fairly, transparently, and in a manner that avoids conflicts of interest and unfair competitive advantage.

Exclusion of Contractors Who Draft Specifications

In accordance with 2 CFR §200.319(a) and (d), contractors that develop or draft specifications, requirements, statements of work, invitations for bids (IFBs), or requests for proposals (RFPs) for the district are excluded from competing for those procurements to prevent unfair competitive advantage.

To ensure compliance:

- Any contractor assisting in drafting procurement documents must disclose in writing their involvement.
- The district documents the contractor's role in the procurement file.
- The contractor is prohibited from submitting a bid or proposal for that specific procurement.
- Procurement files include written confirmation that no vendor involved in drafting specifications participated in the competition.

Development of Clear and Accurate Specifications

VCSS develops clear, accurate, and nonrestrictive descriptions of the technical requirements for materials, products, or services to be procured. Specifications are written to promote full and open competition and to avoid unnecessary restrictions.

Specifications and solicitations shall:

- Clearly describe the scope of work or services required.
- Identify performance standards or functional requirements rather than brand-specific features when possible.
- Avoid overly restrictive or proprietary language unless justified and documented.
- Include delivery requirements, timelines, and performance expectations.
- Be reviewed by the Program Director and Finance Department prior to release.

Brand name specifications are avoided unless necessary to ensure compatibility or performance. When a brand name is referenced, the solicitation will include 'or equal' language and define the salient characteristics required.

Solicitation Requirements and Evaluation Factors

All solicitations for bids or proposals clearly identify the requirements that offerors must fulfill and all factors that will be used in evaluating bids or proposals.

Each solicitation includes, as applicable:

- Detailed scope of work or service requirements
- Required qualifications and experience
- Technical specifications or performance criteria
- Submission instructions and deadlines
- Required certifications and assurances
- Evaluation criteria and relative weighting of factors, when applicable
- Contract terms and conditions

Evaluation criteria are established prior to receipt of bids or proposals and are applied consistently and objectively. The procurement file includes documentation of the evaluation process, scoring sheets (when applicable), committee recommendations, and final award decisions.

Oversight and Documentation

Procurement documentation is maintained in the official procurement file and includes:

- Solicitation documents (IFB, RFP, RFQ)
- Public notice or advertisement documentation, if required
- List of vendors solicited
- Bids or proposals received
- Evaluation documentation and scoring sheets
- Conflict of interest disclosures
- Award recommendation and approval documentation
- Executed contract

The Program Director and Finance Department review procurement documentation to ensure compliance with Federal competition requirements and district procurement procedures.

Methods 200.320

Vidalia City School System (VCSS) utilizes procurement methods in accordance with 2 CFR §200.320 and applicable State and local procurement laws. Procurement thresholds are applied consistently across all funding sources unless more restrictive State or local requirements apply.

Procurement Thresholds

- Micro-Purchase Threshold: ≤ \$10,000 (unless annually self-certified at a higher threshold in accordance with federal regulations).
- Simplified Acquisition Threshold: \$10,001 – \$250,000 (unless a lower local threshold is established).
- Formal Procurement Threshold: > \$250,000 (or lower if required by State or local policy).

Micro-Purchases (≤ \$10,000)

Micro-purchases may be awarded without soliciting competitive price or rate quotations if the district considers the price to be reasonable.

- To the extent practicable, micro-purchases are distributed equitably among qualified suppliers.
- Price reasonableness is determined based on research, experience, purchase history, comparison pricing, or other relevant information.
- Documentation supporting price reasonableness is maintained in the procurement file.
- Purchase cards may be used as a method of payment for micro-purchases.
- If the district elects to self-certify a micro-purchase threshold above \$10,000 (up to \$50,000), certification is completed annually and includes justification, documentation of internal controls, risk evaluation, and compliance with State/local law.
- Any request to increase the micro-purchase threshold above \$50,000 requires GaDOE approval.

Simplified Acquisition (\$10,001 – \$250,000)

The district ensures procurement transaction values do not exceed the simplified acquisition threshold of \$250,000 unless more restrictive local thresholds apply.

- VCSS will obtain price or rate quotations from a minimum of two (2) qualified sources unless a more restrictive local threshold applies.
- Quotes may be written, electronic, or documented verbal quotations.
- Documentation of vendors contacted, quotes received, and selection rationale is maintained.
- Simplified acquisition thresholds are supported by internal controls, risk evaluations, and written procurement procedures.

Formal Procurement (Exceeds \$250,000)

Formal procurement methods are competitive and requires public notice. A cost or price analysis is conducted for all formal procurements.

Sealed Bids (Invitation for Bids)

The district ensures that bids are publicly solicited through an invitation and a firm fixed-price contract (lump sum or unit price) is awarded to the responsible bidder whose bid conforms with all material terms and conditions of the invitation and is the lowest in price.

- A complete, adequate, and realistic specification or purchase description is prepared.
- Two or more responsible bidders are identified as willing and able to compete effectively.
- The procurement lends itself to a firm fixed-price contract.
- Bids are publicly advertised and sufficient response time is provided.
- Bids are opened publicly at the specified time and place.
- Award is made to the lowest responsible bidder.
- Documentation is maintained for any rejected bids, including written justification.
- Additional relevant factors such as discounts, transportation, and life-cycle costs may be considered.

Competitive Proposals (Request for Proposals)

Competitive proposals are used when conditions are not appropriate for sealed bids. This method may result in a fixed-price or cost-reimbursement contract.

- Requests for proposals are publicly advertised.
- All evaluation factors and their relative importance are clearly identified in the solicitation.
- Proposals are solicited from multiple qualified sources.
- Technical evaluations are conducted using a documented scoring or evaluation rubric.
- Contracts are awarded to the responsible offeror whose proposal is most advantageous, considering price and other factors.
- Documentation of evaluations, scoring, and award decisions is maintained.

Noncompetitive Procurement

Noncompetitive procurement (sole source) is used only when one or more of the following conditions are met:

- The procurement does not exceed the micro-purchase threshold.
- The item or service is available only from a single source.
- A public emergency will not permit delay resulting from competitive solicitation.
- Written approval is obtained from GaDOE.
- After soliciting multiple sources, competition is determined inadequate.

Documentation supporting the justification for noncompetitive procurement is maintained in the procurement file and includes rationale, supporting evidence, and required approvals.

Methods for Collection, Transmission, and Storage of Information

200.336

Vidalia City School System (VCSS) maintains procedures to ensure that information related to Federal awards is collected, transmitted, and stored in formats that are accessible, machine-readable, and open when practicable, while also maintaining data integrity and preventing unauthorized modification. These procedures comply with 2 CFR §200.336 and all applicable Federal, State, and local data security requirements.

Collection of Information

- Federal grant information is collected through the district's financial management system (Yoss), grant management platforms (e.g., GaDOE Consolidated Application systems), and supporting documentation maintained by the Federal Programs Office.
- Source documentation includes budgets, expenditure reports, contracts, purchase orders, invoices, time and effort records, reimbursement requests, and programmatic reports.
- Data entered into financial and grant management systems is reviewed by authorized personnel for accuracy and completeness prior to submission or approval.

Transmission of Information

- Federal grant Information is transmitted electronically through secure, password-protected systems (e.g., GaDOE portals, encrypted email, or secure file transfer platforms).
- When transmitting documents externally, files are converted to secure formats (e.g., PDF) to prevent unauthorized alteration.
- Access to grant-related systems is limited to authorized personnel through role-based permissions and multi-factor authentication when available.
- Sensitive information is transmitted in compliance with FERPA and other applicable privacy laws.

Storage of Information

- Federal grant documentation is stored electronically within the district's financial management system and secure shared network drives with restricted access.
- Documents are maintained in open, non-proprietary, and machine-readable formats when practicable (e.g., PDF, CSV, XLSX, DOCX).
- Final versions of key grant documents (e.g., budgets, contracts, reimbursement reports) are saved in read-only or PDF format to prevent unauthorized modification.
- Access rights are controlled through user authentication and permissions managed by the district's technology department.
- Regular system backups are conducted to ensure preservation and recovery of grant-related data.

Data Integrity and Security Controls

- The district employs internal controls to safeguard Federal information against unauthorized access, alteration, or destruction.
- Audit trails within financial and grant management systems document changes, approvals, and user activity.
- Access to records is granted based on job responsibilities and reviewed periodically.
- Electronic records are protected through firewall protections, antivirus software, and routine system monitoring.

Record Retention

In accordance with 2 CFR §200.334, all Federal award records are retained for a minimum of five (5) years after submission of the final expenditure report, unless litigation, audit, or monitoring requires extended retention. Records may be retained in electronic format provided they are accessible, legible, and capable of being reproduced.

Compensation – Personal Services 200.430(a)

Time and Effort Policy 200.430(a)

Vidalia City School System (VCSS) maintains written procedures to ensure that charges to Federal awards for salaries and wages are accurate, allowable, reasonable, properly allocated, and supported by appropriate documentation in accordance with 2 CFR §200.430(i). Time and effort documentation provides reasonable assurance that compensation charged to Federal funds reflects the actual work performed and does not exceed 100% of the employee's total compensated activities.

General Requirements

- Charges to Federal funds for salaries and wages must be based on records that accurately reflect the work performed.
- Documentation must account for the employee's total activity for which the employee is compensated and must not exceed 100% of compensated time.
- Time and effort records must be completed after-the-fact and reflect actual work performed, not budgeted estimates.

- Time and effort documentation is subject to internal controls and supervisory review to ensure accuracy, allowability, and proper allocation.
- All time and effort documentation is retained in accordance with 2 CFR §200.334 record retention requirements.

A time sheet must be maintained by any employee who provides supplemental instruction outside of regular school hours. These time sheets supplement, but do not replace, required annual certifications or personnel activity reports.

Annual Certification (Single Cost Objective)

Annual certifications are required for employees who work on a single cost objective and are paid in whole or in part with Federal funds.

- Certifications are completed after-the-fact and signed by the employee or by a supervisor with firsthand knowledge of the work performed.
- Certifications account for the employee's total activity.
- Certifications are completed annually at the end of the fiscal year.
- Annual certifications may be completed individually or as a group certification.
- Substitutes, bus drivers, child-care providers for parental involvement activities, and stipend recipients funded with Federal funds are included in the annual certification process when applicable.

The Federal Program Directors compile certification lists using payroll reports, absence reports, and Professional Learning Leave Forms to ensure all applicable employees are included.

Annual Certification Compliance Justification

In accordance with 2 CFR §200.430(i), documentation standards for compensation must provide reasonable assurance that charges are accurate, allowable, and properly allocated. Federal regulations do not prescribe a specific frequency for certifications but require that records reflect after-the-fact confirmation of actual work performed. VCSS utilizes annual certifications for single cost objective employees in conjunction with ongoing payroll controls, supervisory oversight, quarterly budget reviews, and internal reconciliations to ensure

continued compliance. This approach provides reasonable assurance of accuracy and allowability while maintaining strong internal controls.

Personnel Activity Reports (Multiple Cost Objectives)

Personnel Activity Reports (PARs) are required for employees who work on multiple cost objectives.

- Employees complete monthly time logs that coincide with one or more pay periods and reflect total activity performed.
- Time logs are signed by the employee and the employee's supervisor.
- Logs are submitted monthly to Federal Program Directors for review and documentation.
- The Federal Program Directors monitor monthly submissions to ensure compliance.
- Supervisors work with employees to reconcile actual effort to payroll allocations.

Budgeted salary allocations are reviewed at least quarterly and adjusted in a timely manner through payroll system updates or journal entries to ensure estimated amounts align with actual effort performed. These adjustments are processed in accordance with district internal controls to ensure salary charges to Federal awards accurately reflect actual work performed and remain reasonable, allowable, and properly allocated.

Stipends Policy – Georgia State Board Rule 160-3-3-.04

Vidalia City School System (VCSS) awards professional learning stipends in accordance with Georgia State Board Rule 160-3-3-.04 and, when applicable, 2 CFR §200.430. This policy ensures that stipends are reasonable, necessary, properly documented, and compliant with Federal, State, and local requirements.

Definition of Stipend

A stipend is defined, in accordance with Georgia State Board Rule 160-3-3-.04, as funds awarded by the LEA to eligible employees for successfully completing professional learning opportunities that occur outside of the employee's normal contract hours, days, or school year.

Eligibility and Required Conditions

Stipends may be awarded only when all of the following conditions are met:

- The professional learning activity occurs beyond the employee’s regular contract hours, days, or school year.
- There is documented evidence that the knowledge, skills, practices, and dispositions gained from the professional learning activity are aligned to an approved individual plan, school initiative, LEA initiative, required product, or specific goals.
- There is documented evidence that the knowledge, skills, practices, and dispositions developed through participation in or facilitation of professional learning have been implemented or demonstrated in the classroom or work setting.
- Compensation is for allowable activities and is reasonable and necessary to the program being supported.
- State and Federal funds designated for professional learning shall not be used to pay stipends to school board members or to school council members who are not employees of the LEA.

Federal Compliance Requirements (When Federally Funded)

When stipends are charged to a Federal award, they must comply with 2 CFR §200.430 and all applicable Federal program requirements.

- Stipends must be reasonable for the services rendered and consistent with compensation practices for similar work funded with non-Federal sources.
- Stipends must be included in the approved grant application and budget.
- Stipends must be allocable to the benefiting Federal cost objective and coded to the correct funding source in the payroll system.
- Stipends must supplement and not supplant existing compensation obligations.
- Stipends are not automatic and are contingent upon verification of attendance, completion of required activities, demonstration of implementation, and submission of required documentation.

Required Documentation

The following documentation must be maintained to support stipend payments:

- Completed stipend contract (required for federally funded stipends).
- Agenda or presentation materials.
- Sign-in sheet verifying attendance.

- Evidence of implementation or demonstration of learning, when applicable.
- Approved payroll documentation and funding source verification.

Stipend Rate and Annual Review

The stipend rate for the current fiscal year is \$200.00 per day. The stipend rate is reviewed annually to ensure reasonableness and consistency with comparable compensation practices within the district and surrounding LEAs.

Internal Controls and Approval Process

- Employees must obtain prior approval for stipend-eligible professional learning when required.
- The Federal Program Director reviews federally funded stipends for allowability and budget alignment prior to payroll processing.
- The Finance Department verifies funding source accuracy and compliance with applicable regulations.
- All stipend payments are subject to district internal controls and audit review.

Fringe Benefits Policy 200.431

Vidalia City School System (VCSS) maintains written procedures to ensure that salaries, wages, stipends, and fringe benefits charged to Federal awards are accurate, reasonable, allowable, properly allocated, and supported by appropriate documentation in accordance with 2 CFR §200.430 and §200.431 and applicable Georgia State Board Rules.

Vidalia City Schools provides for the cost of fringe benefits in the form of employer contributions or expenses for social security; employee life, health, unemployment, and worker's compensation insurance, and pension plan costs.

Calculation and Reasonableness of Fringe Benefits

- Fringe benefit rates are based on established employer contribution rates adopted by the Board of Education.
- Benefit calculations are supported by payroll system reports and actuarial determinations where applicable.

- Fringe benefits are allocated proportionally to Federal awards based on the salary charged.
- Periodic reconciliations are conducted to ensure fringe costs charged to Federal programs are accurate and consistent with actual expenditures.
- Adjustments are made timely if discrepancies are identified.

Employee Health and Welfare Costs Policy 200.437

Vidalia City School System (VCSS) adheres to the Federal cost principles outlined in 2 CFR §200.437 regarding employee health and welfare costs. The district ensures that any costs charged to Federal awards for employee health and welfare are allowable, reasonable, necessary, and allocable to the Federal program.

General Policy

As a general practice, VCSS does not use Federal grant funds to support general employee health and welfare activities that are not directly related to the objectives of the Federal award. Costs intended solely to improve morale, general working conditions, or employee relations are typically supported with non-Federal funds unless expressly authorized and allocable under the specific Federal program.

Allowable Employee Health and Welfare Costs

If and when employee health and welfare costs are charged to a Federal award, the district ensures that such costs:

- Are directly related to the performance of the Federal award;
- Are necessary to carry out program objectives;
- Benefit only the employees working on the Federal program or are proportionately allocated;
- Are consistent with established district policies applicable to both Federal and non-Federal activities;
- Are not entertainment, amusement, or social activities prohibited under 2 CFR §200.438.

Examples of Potentially Allowable Costs (If Applicable)

Subject to program allowability and proper allocation, examples of employee health and welfare costs that may be allowable include:

- Employee assistance programs directly supporting employees funded by the Federal award;
- Work-related health and safety training required for program implementation;
- Costs associated with compliance with workplace safety requirements tied to the Federal program.

Internal Controls and Documentation

The Program Director and Finance Department review any proposed employee health and welfare expenditures charged to Federal awards to ensure compliance with 2 CFR §200.437 and other applicable cost principles.

- Costs are reviewed prior to obligation to confirm allowability.
- Documentation supporting the necessity and allocability of the cost is maintained.
- Costs are monitored during periodic budget reviews to ensure continued compliance.

If a cost is determined to be unallowable under Federal cost principles, it will not be charged to the Federal award and will be supported with non-Federal funds.

Participant Support Costs 200.456

Vidalia City School System (VCSS) administers participant support costs in accordance with 2 CFR §200.456 and applicable Federal program requirements. Participant support costs are direct costs for items such as stipends, subsistence allowances, travel allowances, registration fees, temporary dependent care, and per diem paid to participants or trainees who are not employees or responsible for the administration of the Federal award.

Prohibition on Certain Payments

Participant support costs will not be paid to sub-recipients, consultants, project personnel, or staff members involved in the administration of a Federal award.

Allowable Participant Support Costs

The following participant support cost procedures are applied consistently across all Federal awards administered by VCSS to ensure uniform compliance with 2 CFR §200.456.

When authorized in the approved grant application and budget, VCSS may provide participant support costs to individuals who are not responsible for the administration of the Federal award for activities that build the capacity of stakeholders, including but not limited to:

- Students participating in approved enrichment, academic, or leadership activities.
- Parents or community members participating in engagement, training, or advisory activities.
- Stakeholders attending approved conferences, workshops, or training sessions.
- Other eligible participants as defined by the specific Federal program.

Allowable participant support costs may include stipends, subsistence allowances, travel allowances, registration fees, temporary dependent care, and per diem expenses when such costs are reasonable, necessary, allocable, and explicitly approved within the Federal award.

Internal Controls and Consistency Across Federal Awards

- Participant support costs must be included in the approved grant application and budget.
- The Program Director and Finance Department review proposed participant support costs prior to obligation to ensure allowability.
- Documentation is maintained to support participant eligibility, attendance, purpose of activity, and payment calculations.
- Costs are reviewed to ensure they are not reclassified as compensation for employees or consultants.
- Procedures for participant support costs are applied consistently across all Federal awards administered by VCSS.

Participant support costs are separately tracked within the financial management system to ensure transparency and compliance with Federal reporting requirements.

Travel Costs Policy 200.475; OCGA §50-5B-5; Financial Management for GA LUAs Chapter 40

Vidalia City School System (VCSS) administers travel costs in accordance with 2 CFR §200.474 and §200.475, OCGA §50-5B-5, Financial Management for Georgia Local Units of Administration (LUAs), Chapter 40, and the Georgia Statewide Travel Policy issued by the State Accounting Office (SAO). The district's travel procedures may be more restrictive than State requirements but shall not be less restrictive.

Official Business Requirement

Travel costs are expenses for transportation, lodging, meals, registration, and related items incurred by employees who are in travel status on official business of VCSS. Individuals receiving travel reimbursement must be acting on official business on behalf of the district. Travel must directly relate to the performance and objectives of the Federal award or district operations.

Federal Allowability Standards

- Federally funded travel costs must be reasonable, necessary, allocable, and consistent with the district's non-Federal written travel reimbursement policies.
- Costs must be included in the approved grant application and budget, when required.
- Participation of the individual must be necessary to accomplish the objectives of the Federal award.
- Travel costs must not exceed those normally allowed under the district's written travel policy.
- Documentation must support that the expense directly benefits the funding source charged.

Pre-Approval and Travel Authorization

All travel requires prior approval before expenses are incurred.

- Employees must complete a Professional Learning Leave Form detailing destination, purpose, dates, and estimated expenses.
- The employee's supervisor must approve the request and verify that participation is necessary.

- The Federal Program Director must approve travel funded by Federal programs to ensure allowability and budget alignment.
- The Program Directors and or Program Coordinators verify sufficient funds are available prior to travel authorization.

Allowable Travel Expenses

- Meals reimbursed on a per diem basis for overnight official business outside the traveler's primary work station.
- Lodging reimbursed at actual cost, not to exceed State-established maximum rates unless properly justified.
- Actual cost of the most logical and economical airfare.
- Mileage reimbursement at State-approved rates when a fleet vehicle is unavailable or personal vehicle use is approved.
- Rental vehicle and gasoline costs when a fleet vehicle is unavailable or deemed most efficient.
- Conference registration fees directly related to the Federal program.

Employees must claim exemption from local hotel sales tax when applicable. Lodging receipts are required. Meal receipts are not required when reimbursed using State per diem rates.

Required Documentation

- Approved Professional Learning Leave Form (pre-approval).
- Conference or meeting agenda supporting allocability.
- Completed Travel Reimbursement Request form.
- Itemized lodging receipts.
- Proof of airfare, rental car, parking, or other transportation costs.
- Mileage documentation, if applicable.
- Evidence that participation was necessary to the Federal award.

Travel costs not supported by proper documentation are not allowable and are subject to disallowance.

Review and Reimbursement Process

- The traveler's supervisor reviews and approves the reimbursement request.
- The Federal Program Director reviews federally funded travel for allowability and allocability.
- The Finance Director or designee performs a secondary review prior to payment to ensure compliance with Federal and State requirements.
- Reimbursements are processed through the district's financial system after all approvals are obtained.
- If travel includes sessions not allowable under the funding source, reimbursement will be prorated appropriately.

Conferences and Hosting Requirements (2 CFR §200.432)

- The district exercises discretion and judgment when authorizing expenditures related to conferences to ensure costs are appropriate, necessary, and minimized.
- Food and beverage costs paid with Federal funds require a high burden of proof and must be justified as necessary to meet program objectives.
- When hosting meetings or conferences, alternative methods such as virtual participation should be considered to minimize costs.
- Prior approval from the Program Manager is required before planning or hosting federally funded meetings or conferences.

Record Retention

All travel documentation is maintained in accordance with 2 CFR §200.334 and district record retention policies and is subject to review during monitoring or audit.

Equipment Management 200.313(d)

Vidalia City School System (VCSS) manages equipment purchased with Federal funds in accordance with 2 CFR §200.313(d) and the definition of equipment in 2 CFR §200.1. These procedures ensure proper inventory control, safeguarding, maintenance, monitoring, and disposition of federally funded equipment.

Definition of Equipment and Applicable Thresholds

Equipment is defined as tangible personal property (including Yosstion technology systems) having a useful life of more than one year and a per-unit acquisition cost equal to or exceeding the lesser of the district's capitalization level for financial statement purposes or the Federal threshold.

For equipment purchased with Federal funds:

- For awards issued prior to and including Fiscal Year 2025 (FY25), equipment is defined as items with a per-unit acquisition cost of \$5,000 or more, consistent with prior Federal guidance.
- For awards issued in Fiscal Year 2026 (FY26) and beyond, equipment is defined as items with a per-unit acquisition cost of \$10,000 or more, in accordance with the updated definition in 2 CFR §200.1.

VCSS maintains inventory and monitoring procedures consistent with the applicable threshold in effect at the time of the Federal award.

Inventory Management System

Federal equipment inventory records are maintained at the school level by the media specialist using a district-provided inventory spreadsheet. Inventory spreadsheets are housed at each school and maintained locally.

Inventory records are reviewed and formally monitored by the Federal Programs Director or designee at least once every two (2) years to ensure compliance with Federal requirements.

Required Property Records

- Description of the property
- Serial number or other identification number
- Federal Award Identification Number (FAIN)
- Funding source
- Acquisition date
- Acquisition cost
- Percentage of Federal participation in the cost
- Location of the equipment

- Use of the equipment
- Condition of the equipment
- Disposition data, including date and sale price (if applicable)

Physical Inventory and Reconciliation

A physical inventory of federally funded equipment is conducted at least once every two (2) years by the Federal Programs Director and the school media specialist.

The results of the physical inventory are reconciled with the property records. Any discrepancies are investigated, documented, and resolved promptly. Documentation of reconciliation is maintained on file at both the school and district level.

Safeguards and Loss Prevention

- All federally funded equipment is added to the district or school inventory or management system with identifying information including the federal funding program name and FAIN.
- Access to equipment is limited to authorized personnel.
- Inventory records are updated when equipment is relocated.
- If equipment is lost, stolen, or damaged, the principal or designee must notify district administration immediately.

In cases of suspected theft or malicious damage, a police report must be filed. An internal investigation will be conducted, findings documented, and the Georgia Department of Education notified when required.

If loss, theft, or damage involves federally funded equipment, the Federal Programs Director will determine whether notification to the Georgia Department of Education is required and will submit appropriate documentation of the investigation, findings, and corrective actions. Documentation of reporting and resolution will be maintained in the equipment inventory file.

Maintenance Procedures

Schools are responsible for ensuring federally funded equipment remains in proper working condition.

- Routine inspections are conducted by school personnel.

- Repairs are coordinated with the district Technology Director when necessary.
- Extended damage or unusable equipment must be reported to the Federal Programs Director.

Off-Site Use of Equipment

Off-site use of federally funded equipment is permitted only for school-related purposes. Equipment checked out for virtual instruction or approved school activities must be signed out and signed back in by the media specialist, administrator, or authorized designee.

Use of Federal equipment for personal activities is strictly prohibited.

Private School Equipment

Equipment purchased with Federal funds for services to eligible private school participants remains the property of the LEA. If services to a private school cease, equipment must be returned to VCSS. The Federal Programs Director oversees inventory and compliance for any participating private school.

Disposition of Equipment

When equipment is no longer needed for the original program or any other Federally supported activity, the Federal Programs Director will request disposition instructions from the Georgia Department of Education when required.

If the equipment has a current fair market value equal to or exceeding the applicable Federal threshold in effect at the time of award (\$5,000 for awards through FY25; \$10,000 for FY26 and beyond), disposition instructions will be obtained from GaDOE prior to sale or disposal.

- A disposition form must be completed and maintained.
- The date of disposition must be recorded in the inventory record.
- Proceeds from sale, when applicable, will be handled in accordance with Federal regulations.
- Disposition records are retained for at least five (5) years following final disposition.

Record Retention

All equipment records are retained in accordance with 2 CFR §200.334 and district record retention policies.

Federal Payment 200.302(b)(6); 200.305

Vidalia City School System (VCSS) manages Federal payments in accordance with 2 CFR §200.302(b)(6) and §200.305 to ensure effective cash management procedures. The district minimizes the time elapsing between the receipt of Federal funds from the Georgia Department of Education (GaDOE) and the disbursement of funds for incurred expenditures.

Minimizing Time Between Drawdown and Disbursement

- Drawdowns are requested only for actual, allowable expenditures that have already been incurred.
- Cash requests are limited to the immediate cash needs of the district.
- Funds are disbursed promptly upon receipt to liquidate incurred obligations.
- The district does not draw down funds in advance of need except as permitted under Federal regulations.

Drawdown Reconciliation and Internal Controls

VCSS maintains separation of duties in the drawdown and reconciliation process to ensure proper oversight.

- The Finance Director or designee prepares the drawdown request based on general ledger expenditure reports.
- Federal Program Directors review expenditures for allowability and budget alignment prior to submission.
- Federal Program Directors review and approve the drawdown request before submission to GaDOE.
- Drawdowns are reconciled monthly to the general ledger and grant expenditure reports.
- Any discrepancies identified during reconciliation are investigated and resolved promptly.

Calculation of Drawdowns Under Consolidation of Funds

If and when participating in consolidation of Federal funds in a schoolwide program, VCSS calculates drawdowns based on actual allowable expenditures attributable to each contributing Federal program. Currently, VCSS does not participate in consolidation of funds.

- Expenditures are tracked by funding source within the financial management system.
- Drawdown calculations reflect the proportionate share of expenditures allocable to each Federal award.
- Documentation supporting allocation methodologies is maintained.
- Federal Program Directors verifies that consolidated expenditures remain consistent with approved program purposes.

Completion Reports and Final Reconciliation

Completion reports are prepared within thirty (30) days following the end of the grant period or in accordance with Georgia Department of Education established deadlines, whichever is sooner. Program Directors responsible for verifying programmatic allowability and alignment with the approved grant, and the Finance Director or designee is responsible for financial reconciliation and confirmation that total drawdowns equal total allowable expenditures recorded in the general ledger.

- Federal Program Directors review final program expenditures for allowability and alignment with the approved grant.
- The Finance Director or designee reconciles total drawdowns to total allowable expenditures recorded in the general ledger.
- Any unexpended funds are identified and addressed in accordance with GaDOE guidance.
- Final reports are submitted within the required timeline established by GaDOE.
- Documentation supporting completion reports is retained in accordance with record retention requirements.