

TO:	BOARD OF DIRECTORS
FROM:	STEVE LIDGARD, EXECUTIVE DIRECTOR – BUSINESS SERVICES
SUBJECT:	APPROVAL OF THE FIRST READING OF POLICY 6106
	ALLOWABLE COSTS FOR FEDERAL PROGRAMS
DATE:	AUGUST 4, 2020
TYPE:	ACTION NEEDED

The Washington State School Directors Association has developed and recommends the district adopt this policy regarding the expenditure of federal funds.

Recommendation:

We recommend the board *approve the first reading of Policy 6106 Allowable Costs for Federal Programs.*

Allowable Costs for Federal Programs

Expenditures under federal programs are governed by the Federal Cost Principles contained in 2 CFR Part 200 Subpart E – Cost Principles. The district is committed to ensuring that costs claimed under Federal awards follow these cost principles as well as any special terms and conditions contained in the award. Additionally, as a grantee, the district is required to follow the more restrictive of the federal, state, and district policies.

When applying these cost principles, the district will:

- Maintain responsibility for the efficient and effective administration of the Federal award through the application of sound management practices;
- Assume responsibility for administering federal funds in a manner consistent with underlying agreements, program objectives and the terms and conditions of the federal award; and
- Apply accounting practices that are consistent with the cost principles, support the accumulation of costs as required by the principles, and provide for adequate documentation to support costs charged to the federal award.

The district will maintain a system of internal controls over federal expenditures to provide reasonable assurance that Federal awards are expended only for allowable activities and that the costs of goods and services charged to Federal awards are allowable and in accordance with the above referenced cost principles. Those controls will meet the following general criteria:

- Be necessary and reasonable for the performance of the Federal award and be allocable thereto under these principles;
- Conform to any limitations or exclusions set forth in these principles or in the Federal award as to types or amount of cost items;
- Be consistent with policies and procedures that apply uniformly to both federally-financed and other activities of the district;
- Be accorded consistent treatment;
- Be determined in accordance with generally accepted accounting principles;
- Not be included as a cost or used to meet cost sharing or matching requirements of any other federally-financed program in either the current or a prior period; and
- Be adequately documented.

In extraordinary circumstances, such as those caused by emergencies, the district may continue to pay the compensation of employees who are paid with Federal grant funds using the Federal funds, despite the employees' inability to work due to the extraordinary circumstances, consist with the districts' use of all funding sources to pay its employees.

Cross References:

1610 - Conflicts of Interest
6101 - Federal Cash and Financial Management
6210 - Purchasing: Authorization and Control
6220 - Bid or Request for Proposal Requirements
6801 - Capital Assets/Theft-Sensitive Assets
3423 - Parental Administration of Marijuana for Medical
Purposes

Legal References:

2 CFR Part 200, Subpart E

Management Resources:

2015 - December Issue 2020 - May May Issue

Adoption Date: Stanwood-Camano School District Revised Date: