

Policy for the Application, Receipt, and Expenditure of Grant Funds

Goal

It is the goal of the School's Non-Profit Board of Directors ("Board") to maximize the amount of Grant Funds available for the School. The Board establishes this Policy to delineate the roles and responsibilities of those persons or entities responsible for applying for, receiving, and expending Grant Funds and accounting for them during and after the expenditures have been completed.

Application

The Board has contracted with an Education Management Organization ("EMO") to operate the School and delegates to the EMO the responsibility for researching and applying for grants, including, but not limited to Title I (all sections), Title II-A, Title II-D, Title III LEP, IDEA-B. The EMO shall prepare each grant application ("Application") in accordance with all legal requirements and shall submit the Application to the Board Designated Fiscal Officer for approval. Subsequent amendments to the Application shall also be approved by the Board Designated Fiscal Officer.

Expenditures

When the Board receives an allocation of Grant Funds and delegates to the EMO the responsibility for spending the Grant Funds on behalf of the School in accordance with the Application and in accordance with federal, state and local laws where applicable including but not limited to 34 CFR 80.36 and 34 CFR 70.20 et seq. related to procurement.

The EMO shall establish for the EMO the minimum policies, procedures, and internal controls needed to comply with federal legal requirements related to the expenditure of Grant Funds. The internal controls shall include procedures for suspension and debarment. The designated superintendent shall have the authority to suspend or debar a person/corporation, for cause, from consideration or award of further contracts. The superintendent shall comply with all federal regulations regarding suspension and debarment. The EMO shall not contract with any person who is suspended or debarred.

The EMO shall only award contracts to responsible contractors that are able to perform under the terms of the contract. The EMO shall consider the following factors when making a purchasing decision: contractor integrity; compliance with public policy; record of past performance; and financial and technical resources.

The Board delegates to its Designated Fiscal Officer the responsibility for receiving, reviewing and submitting to the Ohio Department of Education for approval all invoices related to the expenditure of Grant Funds.

The EMO shall from time to time present to the Board's Designated Fiscal Officer invoices related to the expenditure of funds on eligible activities under the Application. In requesting reimbursement, the EMO shall certify to the Board's Designated Fiscal Officer that to the best of the EMO's knowledge all expenditures have been made in accordance with the Application and in accordance with applicable law and this policy.

Reporting

The Board's Designated Fiscal Officer and the EMO shall prepare on a monthly basis a report detailing the expenditure of Grant Funds on a year-to-date basis by fund category in relation to the Grant Funds allocated to each category and such other detail as the Board may require from time to time. The Board shall review these reports at Board meetings.

The Board delegates to its Designated Fiscal Officer the responsibility for preparing and filing all annual reports related to the expenditure of Grant Funds, including but not limited to, the Final Expenditure Report and to meet with any auditors related to these expenditures. The Board's Designated Fiscal Officer shall present to the Board for its review the Final Expenditure Report and any other annual reports on the expenditure of Grant Funds.