



SCHEDULE OF FISCAL MONITORING FINDINGS

March 16, 2015

495 ALTURAS CHARTER SCHOOL

Schedule of IDEA Part B fiscal monitoring findings

Section 6

Background

It is the responsibility of the LEA's management to ensure that procedures are put in place to comply with the Uniform Grant Guidance debarment and suspension policy. In addition, the LEA must conduct procurements in a manner that prohibits the use of statutorily or administratively imposed state, local, or tribal geographical preferences in the evaluation of bids or proposals, except in those cases where applicable Federal statutes expressly mandate or encourage geographic preference.

Finding #1: 2 CFR §200.213 Suspension and debarment. The LEA does not have procedures for debarment and suspension policy as required under the Uniform Grant Guidance.

Finding #2: 2 CFR §200.319 (b) The current written procedures does not including a language on prohibition of using local preferences for vendor selection.

Effect of the findings

The inexistence of the written policies and procedures could increase the likelihood of noncompliance with federal requirements. In the absence of clear processes, there is a risk of hiring entities or individuals - included in the federal government suspension and debarment list - to provide goods or services. In addition, there is a risk of applying favoritism based on geographical location when selecting vendors for contracts.

Recommendation for Corrective Action Plan

To mitigate the risk of noncompliance, the LEA should update their current policies and procedures to include a language describing compliance with the federal codes mentioned above.

Proposed language to include in policies and procedures for finding #1

“Debarment and Suspension. The LEA awards contracts only to responsible contractors possessing the ability to perform successfully under the terms and conditions of a proposed procurement. Consideration will be given to such matters as contractor integrity, compliance with public policy, record of past performance, and financial and technical resources. The LEA may not subcontract with or award subgrants to any person or company who is debarred or suspended. For all contracts over \$25,000 the LEA verifies that the vendor with whom the LEA intends to do business with is not excluded of disqualified”

Proposed language to include in policies and procedures for finding #2

“Geographical Preferences Prohibited. The school will conduct procurements in a manner that prohibits the use of statutorily or administratively imposed state, local, or tribal geographical preferences in the evaluation of bids or proposals, except in those cases where applicable federal statutes expressly mandate or encourage geographic preference. When contracting for architectural and engineering (A/E) services, geographic location may be a selection criterion provided its application leaves an appropriate number of qualified firms, given the nature and size of the project, to compete for the contract.”

The LEA should submit a copy of the final approved written policies and procedures to the Funding and Fiscal Accountability Office with evidence of their adoption such as minutes of board meeting.

Section 8

Background

The financial management system of the LEA must provide the identification, in its accounts, of all Federal awards received and expended and the Federal programs under which they were received. It must also provide accurate, current, and complete disclosure of the financial information.

Finding #1

§200.302 Financial management The LEA current FY 2017-2018 budget report does not include the final IDEA budget amount approved for FY 2017-2018.

Effect of the finding

The inaccurate budget amount listed in the budget report could increase the risk overspending of the current IDEA Part B award amount.

Recommendation for Corrective Action Plan

The LEA indicated that the budget will be amended during the board meeting in May when they submit next year’s budget for approval. The LEA should submit a copy of the amended budget to the Funding and Fiscal Accountability Office upon correction in the financial management system.

Section 10

Background

It is the responsibility of the LEA management to develop, approve, and implement policies and procedures required to be in writing under the uniform grant guidance.

Finding #1

- 2 CFR § 200.430 Time and Effort policies and procedures
- 2 CFR §200.313 Inventory Management policies and procedures
- 2 CFR §200.333 Records Retention policies and procedures
- 2 CFR §200.302 Cash management policies and procedures

The LEA does not have all the following policies and procedures written as required under the uniform grant guidance. Some policies are missing and some are still in draft version but not yet approved by the board.

Effect of the finding

The inexistence of the written policies and procedures could increase the likelihood of noncompliance with federal requirements. In the absence of clear written processes, there is a risk of inconsistency in the application of the procedures by staff paid with or using IDEA Part B funds in their normal operations.

Recommendation for Corrective Action Plan

To mitigate the risk of noncompliance, the LEA should finalize the above mentioned policies and procedures and submit this for board approval. The LEA should submit a copy of the final approved written policies and procedures with evidence of their adoption such as minutes of board meeting.

LEA's written response to the finding should

1. Reference the finding
2. Provide a specific measurable objective for satisfying the finding
3. Timeline for resolution or corrective action plan
4. Clear lines of responsibility for the different steps in the resolution.

As part of the technical assistance, you are strongly encouraged to work with our office in drafting your response. If your findings are related to your policies and procedures, fiscal reviewers can review your draft policies and procedures prior to their submission to your board for approval.

Policy History:

Adopted on: April 19, 2018

Revised on:

Jared Allen, Board Chair