



**THE VIRGIN ISLANDS DEPARTMENT OF EDUCATION
GRANTS MANAGEMENT & REPORTING POLICY AND PROCEDURES**

Policy/Procedure Title:	GM 1.4 – Grants Monitoring and Reporting
Purpose:	This procedure establishes guidelines for the fiscal management of the federal grant.
Abbreviations:	VIDE – Virgin Islands Department of Education
Policy:	<ol style="list-style-type: none"> 1. The Virgin Islands Department of Education (VIDE) shall coordinate the development of program codes to support the grant application submitted to USDOE. Such codes must facilitate accurate reporting of programmatic initiatives and related expenditures. 2. The Virgin Islands Department of Education is responsible for monitoring the execution and spending of federal grant funds to ensure funds are spent for their intended purpose and to prevent lapsing of funds. 3. The federal grants manager will provide a Grant Status Report on a weekly Basis and disseminate it to the Commissioner, Assistant Commissioner, Superintendents, Title V Supervisors, and Program Manager

Procedure:
<p>Fiscal Monitoring utilizes financial information to evaluate grant receipts and disbursements.</p> <ol style="list-style-type: none"> 1. The Federal Grants Director utilizes the approved application and budget to perform grants monitoring, tracking of spending to ensure grants funds are spent only on allowable cost and to prevent lapsing of federal funds: <ol style="list-style-type: none"> a. Collects and distributes bi-weekly time distributions, Personal Activity Reports , and Semi- Annual Time Certifications for submission to the Payroll Director for analysis and reimbursement to the GVI; b. Reviews and approves per diems to ensure expenses are allowable, reasonable, allocable, and comply with the grant requirements; c. Reviews and approves requisitions to ensure purchases are allowable, reasonable, allocable, and comply with the grant requirements; d. Reviews and approves travel to ensure expenses are allowable, reasonable, allocable, and comply with the grant requirements; e. Allowable costs. Factors affecting allow ability of costs. To be allowable under



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Federal awards, costs must meet the following general criteria:

- Be necessary and reasonable for proper and efficient performance and administration of Federal awards.
- Be allocable to Federal awards under the provisions of this Circular.
- Be authorized or not prohibited under State or local laws or regulations.
- Conform to any limitations or exclusions set forth in these principles, Federal laws, terms and conditions of the Federal award, or other governing regulations as to types or amounts of cost items.
- Be consistent with policies, regulations, and procedures that apply uniformly to both Federal awards and other activities of the governmental unit.
- Be accorded consistent treatment. A cost may not be assigned to a Federal award as a direct cost if any other cost incurred for the same purpose in like circumstances has been allocated to the Federal award as an indirect cost.
- Except as otherwise provided for in this Circular, 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 Federal award in either the current or a prior period, except as specifically provided by Federal law or regulation.
- Be the net of all applicable credits.
- Be adequately documented.

f. Reasonable costs. A cost is reasonable if, in its nature and amount, it does not exceed that which would be incurred by a prudent person under the circumstances prevailing at the time the decision was made to incur the cost. The question of reasonableness is particularly important when governmental units or components are predominately federally funded. In determining reasonableness of a given cost, consideration shall be given to:

- Whether the cost is of a type generally recognized as ordinary and necessary for the operation of the governmental unit or the performance of the Federal award.
- The restraints or requirements imposed by such factors as: sound business practices; arm's length bargaining; Federal, State and other laws and regulations; and, terms and conditions of the Federal award.
- Market prices for comparable goods or services.
- Whether the individuals concerned acted with prudence in the circumstances considering their responsibilities to the governmental unit, its employees, the public at large, and the Federal Government.
- A significant deviation from the established practices of the governmental unit which may unjustifiably increase the Federal award's cost.

g. Allocable costs.



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- A cost is allocable to a particular cost objective if the goods or services involved are chargeable or assignable to such cost objective in accordance with relative benefits received.
 - All activities which benefit from the governmental unit's indirect cost, including unallowable activities and services donated to the governmental unit by third parties, will receive an appropriate allocation of indirect costs.
 - Any cost allocable to a particular Federal award or cost objective under the principles provided for in this Circular may not be charged to other Federal awards to overcome fund deficiencies, to avoid restrictions imposed by law or terms of the Federal awards, or for other reasons.
 - Where an accumulation of indirect costs will ultimately result in charges to a Federal award, a cost allocation plan will be required as described in Attachments C, D, and E.
- h. Ensures grant application budgets are appropriately allocated at the organization, object, project levels;
- i. Provides monthly report to the Commissioner of Education;
- j. Conducts quarterly reviews;
- k. Provides technical assistance to LEAs, SEA staff and Program Managers;
- l. Determines the necessity for Budget Amendments;
- m. Determines necessity to reprogram anticipated carryover of grant funds from previous school year;
- n. Prepares anticipated carryover request and submits to USDOE;
- o. Revises and finalizes carryover request in October and re-submit to USDOE; and
- p. Ensures timely and accurate analysis and draw down of Indirect Costs.
2. The Federal Grants Director ensures that the Federal Grant Managers reviews the grant account balances with their respective Program Managers by the 15th of each month. (Note: Program Managers are responsible for using the MUNIS system to manage their available account balances).
3. The Program Managers are responsible for obligating and to the greatest extent possible liquidating all their funds during the performance period of the grant (Year 1 of the grant).
- a. Program Managers with remaining balances as of April 1 must provide a spending plan for the remaining funds for the grant period to Federal Grants Director by April



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30;

4. Programs that have a remaining balance of 75% and have not submitted a detailed spending plan by April 30th will be contact Federal Grants Director to discuss reprogramming of their funds. The reprograming process will consist of:
5. Federal Grants Director determines whether reprogramming is necessary and provides the Budget Control Director with the necessary adjustments for MUNIS update;
 - a. The Budget Control Director enters reprogramming data into MUNIS.
 - b. For programs that require revisions in excess of 10% of the grant award, USDOE approval is required; and
 - c. The Federal Grants Director submits revision request to USDOE as necessary.
 - d. Upon approval the Budget Control Director enters budget into MUNIS
6. Fiscal monitoring of grants is facilitated by reports generated by the Federal Grants Director for review and analysis. Fiscal reports include:
 - a. Grants Status Report (SEE 1.4H), prepared and disseminated weekly. The Grant Status Report provides detail on all active grants to include :
 - Budget Data (aggregate budgets equal net authorized amounts/grant award)
 - Personnel Costs
 - Indirect Cost
 - Operating Costs
 - Cumulative to date expenditures
 - Personnel Costs
 - Indirect Costs
 - Operating Costs
 - Pre-Encumbrance Data (Operating)
 - Encumbrance Data (Operating)
 - Remaining Available Grant Funds
 - Personnel Costs
 - Indirect Costs
 - Operating Costs
 - Percentage of Remaining Available Grant Funds (Operating)
 - Last day to encumber
 - Last day to draw
 - b. Flexible Period Reports are produced at the end of each month to facilitate the



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reconciliation of MUNIS to the USDOE G5 system (SEE GM PP 1.10).

- c. Requisitions in Progress Report is prepared weekly is submitted to the Federal Grants Management Staff. The report is used to details number and dollar value of outstanding requisitions by approver in the system. The report also shows the average number of days the requisition sits in approvers queue.
7. The Federal Grants Director compiles a monthly status report to review with VIDE Senior Management. The purpose of the meeting is to advise them of remaining grant funds to be expended, discuss and resolve operational concerns and discuss spending plans to prevent lapsing of funds.

Control Point 1 –Monitoring. The Federal Grants Director compiles fiscal reports and advise VIDE Senior Management on fiscal management of grant funds (i.e. lapsing of funds, overspending of budgeted amounts).

Programmatic Monitoring evaluates the performance of the programs funded by the USDOE

8. Federal Grants Director utilizes a “Master Calendar” to ensure that all grant programs are appropriately monitored. The Master Calendar consists of:
 - a. Listing of all grant programs;
 - b. Program performance periods;
 - c. Program and reporting requirements;
 - d. Program and reporting deadlines; and
 - e. Responsible Program Managers.
9. The Federal Grants Director submits standardized self-assessment tools for the Program Managers to evaluate their program performance.
10. The Federal Grants Director collects and review results of the self-assessments to determine whether execution of program objectives and scope are being met.
11. The Federal Grants Director performs periodic site visits to ensure that Program Managers are properly executing their program requirements and verify whether supporting documentation is obtained and maintained.

(Note: Grant Managers are responsible for monitoring various clusters of programs covering all grant award programs including State Offices, Local Education Agencies, Private and Public



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Schools and Non-Profit Program locations).

- a. If program objectives are not met, Grant Managers assist Program Managers with developing and implementing corrective action plan (CAP) steps. The CAP entails reviewing program accomplishments, shortfalls and providing technical assistance.
- b. If program objectives are met, Grant Managers document successful performance.

Control Point 2 –Review and Monitor. Grant Managers perform site visits to monitor program execution and ensure program objectives are appropriately met and documented.

12. The Federal Grants Director compiles self-assessments and site visit data into a performance measurement document.
13. The Federal Grants Director and VIDE Senior Management conduct monthly meetings to discuss program performance.

Grant Reporting

14. Federal Grant Director prepares and submits the following reports:
 - a. Monthly federal reports to the Virgin Islands Board of Education;
 - b. Quarterly Compliance Report to the Office of the Commissioner (October 1, January 1, April 1 and July 1);
 - b. Annual performance report which summarizes program performance (e.g., details whether programs are in compliance with grant requirements).
 - i. October 30 – Prepare report by compiling data from Program Managers. Submit to Commissioner and Assistant Commissioner(s) for review; and
 - ii. December 30 – Submit Annual Performance Report with Financial Summary to USDOE.