



## Federal Programs Expenditure of Funds and Allowability Procedures

*Section CFR 200.302(b)(7) requires districts to have written procedures for determining the allowability of costs in accordance with Subpart E- Cost Principles of this part and the terms and conditions of the Federal award.*

### Written Procedures for Purchasing

1. Research items needed for the best price and determine if the purchase is reasonable, allocable, and necessary.
2. If determined allowable, ensure you have available funds to support the potential purchase.
3. If the purchase is a Title I or Perkins purchase, submit the appropriate Procurement Form. For other federal programs, provide the principal approved purchase request and company quote via email to the Federal Programs Director.
4. The Federal Programs' Director will apply the second round of "Determination of the Purchase" (See below) to establish if the purchase is: reasonable, allocable, and necessary.
5. If deemed an allowable expense, the Federal Programs' Director will check the funding availability, code the purchase request and submit it to the District Finance Officer.
6. The District Finance Officer double checks the budget and the coding of the purchase request and gives it to the Account Clerk who enters the requisition into Munis to convert it into a purchase order.
7. The District Finance Officer will then approve the purchase order in Munis.
8. Once the purchase order is approved, the Account Clerk sends the purchase order to the author of the purchase request or will place the order.
9. When the order arrives, there is a verification of receipt (Confirmed shipping documentation with the initials of who received and checked the order for accuracy and fulfillment.) The verification is sent to/or obtained by the Account Clerk.
10. The materials are recorded and tagged for inventory, if applicable.
11. Upon receiving verification of receipt, the District Finance Officer approves payment of the invoice to the Account Clerk.
12. The Account Clerk maintains a copy of the invoice with a copy of the purchase request and purchase order for the number of years required per Records Retention Schedule.

### Determination of Purchase

#### **Reasonable:** *Not excessive in cost and based on prudent and sound purchasing practices*

- Does the cost seem reasonable in comparison to other examples I have encountered?
- Does the expenditure help to target low-achieving students?

#### **Allocable:** *Cost is incurred specifically for the benefit of the program, distributed proportionately, an allowable activity, and meets the program's intent*

- Does the cost meet the intent of the program?
  - **Schoolwide Program:** Does it focus on improving achievement across the entire school, particularly for those lowest-achieving students? Is it tied to the schoolwide planning components?
  - What does statute, regulation, uniform grant guidance or non-regulatory guidance say about the allowability of this cost?
- Is the purchase supported by the funding matrix (located on KDE's webpage) and/or allowable MUNIS codes in GMAP?

#### **Necessary:** *Essential for carrying out the needs-based program*

- Could the cost be deemed necessary for the operation of a quality, efficient program?
- Is the need for the cost supported in the needs assessment, CDIP/CSIP or a statement in the GMAP application?

#### **Documented:**

- Could the district readily document the expenditure of funds and allowability procedure?