**Rhode Island 21st Century Community Learning Center (21st CCLC) grant**

**Budget Guide**

**Updated November 2023**

# I. General Information

## Background

The Nita M. Lowey 21st Century Community Learning Center grant is federal funding for out-of-school time programming, authorized under the [Every Student Succeeds Act](https://www.ed.gov/essa) (ESSA; see Title IV, Part B). Funding flows from the US Department of Education (the “grantor”) to the Rhode Island Department of Education (RIDE, the “grantee”). Annual funding amounts for the program are determined by Congress as part of the federal budget, with funding amounts for each state determined by federal formula based on population size and poverty rates. RIDE, in turn, issues funding to Local Education Agencies (LEAs) or Community-Based Organizations (CBOs) (the “subgrantees”) as five-year grants, chosen through a competitive Request for Proposal process.

The funds are governed by the following federal fiscal regulations:

* [Title 34, CFR](https://www2.ed.gov/policy/fund/reg/edgarReg/edgar.html) – Education Department General Administrative Regulations (EDGAR), especially [Part 76 (State-Administered Programs)](https://www.ecfr.gov/cgi-bin/text-idx?SID=dad45ad671686053a76c7c23296b4761&mc=true&tpl=/ecfrbrowse/Title34/34cfr76_main_02.tpl)
* [Title 2, CFR](https://www2.ed.gov/policy/fund/reg/edgarReg/edgar.html) – Office of Management and Budget Guidance for Grants and Agreements, especially [Part 200 (“Uniform Guidance”)](https://www.ecfr.gov/cgi-bin/text-idx?SID=a3a33f2ac61d52352d011f60ff86ce8f&mc=true&tpl=/ecfrbrowse/Title02/2cfrv1_02.tpl#200)

## Guiding Principles

As with other federal funding streams, 21st CCLC funds must meet these overarching federal requirements:

* **Allowable** – All costs charged to the grant must be allowable – or not specifically prohibited – under federal regulations (see below).
* **Necessary** – All costs must be necessary for the program’s success. They should help to make an activity or the program as a whole function properly and effectively.
* **Reasonable** – For all expenditures, the grantee follows sound business practices, pays a fair market price, and acts with prudence.
* **Allocable** – The costs must benefit the federal program in proportion to the amount charged to the grant. In other words, the federal grant cannot pay for more than its share of any goods or services purchased (though it may pay for less). This includes staff time, as well as supplies, equipment, etc.
* **Documented** – The grantee must maintain documentation for all phases of the grant process. Such documentation should be sufficient to support the decision to spend funds and subsequently to trace how funds were spent.

## Importance of Agency Policies

In many cases, the federal fiscal regulations do not mandate specific rules or procedures. Rather, they emphasize the importance of each agency that receives federal funds having clear, written, internal policies and procedures (e.g., related to procurement) and then following those policies and procedures faithfully [2 CFR § 200.400]. It also includes other internal fiscal controls to ensure the effective, efficient, and appropriate use of funds as well as to prevent potential waste, fraud, or abuse.

## Supplement Not Supplant

Similar to other federal education funding streams, 21st CCLC funds should only be used to supplement, not supplant, other federal, state, and local public sources of funding [ESSA §4204(b)(2)(G)].

There are two basic presumptions of supplanting:

1. Using 21st CCLC funds to provide services that an LEA is required to provide under federal, state, or local law.
2. Using 21st CCLC funds to provide services that were provided with non-federal funds in the prior year(s).

When one of those situations arises, it is presumed to be supplanting. However, you can rebut those presumptions. For example, with #2, if you can show that the funds you used in the past are no longer available (e.g., a grant has ended) and these services would go away in the absence of 21st CCLC funds, then there is no supplanting.

For 21st CCLC, questions of supplanting come up most frequently with staffing, particularly when a position is listed in the grant budget that was not listed in the previous budget. Please see “Categories 51000/52000 Employee Compensation and Benefits” in Section II below.

# II. Budget and Budget Narrative

## Purpose

The goal for the *Budget* and the *Budget Narrative* forms is for an outside reader to be able to understand clearly how the funds will be spent and how the program will operate. The budget provides a visual snapshot, with specific dollar amounts for each item, while the budget narrative provides additional detail and justification.

For each item in your budget request, you should describe what it is, what the rate or cost basis is, and how many or how much you are purchasing. If appropriate, please make it clear how many students will be served with each item. The cost basis should be an equation (or number sentence) that clarifies how you got to the total dollar amount for each line. Examples of cost basis include:

* X hours \* Y $/hour = $Z
* X contracts \* Y $/contract = $Z
* X $/student in supplies at \* Y students = $Z

The cost basis should allow the reader to assess whether the spending is allowable, necessary, and reasonable. For budget items that may contain various types of expenses (e.g., a family engagement activity that includes food, supplies, and additional staff time), please provide a breakdown of how much would be spent on each, as well as the cost basis(es).

Please pay attention to who the fiscal agent is for the grant when determining which budget categories various items belong in. For instance, if the school district is the fiscal agent, then supplies purchased by a Community-Based Organization partner would be under the 53000 Purchased Services category, rather than 56000 Supplies & Materials. Likewise, if a CBO is the grant recipient, then teachers paid by the school district (and reimbursed by the CBO) would be included in 53000 Purchased Services, rather than 51000/52000 Employee Compensation and Benefits.

## Categories 51000/52000 Employee Compensation and Benefits

This category is for employees hired by the fiscal agent, including stipended positions, but not for consultants or contractors. If a position is salaried, please ensure that the FTE of Position and % Paid for by this Grant columns are complete. In the former, you should say how many Full-Time Equivalents a position is (i.e., 1.00 FTE, 0.33 FTE, etc.) In the latter you should indicate how much of the position is paid for with this grant, as opposed to other funding sources. If a position is hourly, please leave the FTE column blank and instead include the hours and rate in the Position column. Whether salaried or hourly, each line should only list the amount paid for by 21st CCLC funds. If a position is dedicated full-time to the 21st CCLC but is also supported through other funds, please note that in the budget narrative.

Every salary line budgeted must have a corresponding fringe benefits amount – even if it only includes 1.45% for Medicare. This column should not be blank or $0. In the budget narrative, please indicate how the fringe benefits were calculated and a brief description of what is included. 21st CCLC funds should not be supplanting costs for fringe benefits covered by other funding sources (e.g., health insurance for school day teachers). For positions with more than one funding source, the percentage of salary paid by the 21st CCLC grant must be the same as the percentage of fringe benefits paid by the grant.

**Stipended positions:** If you are providing a stipend to someone for their services – including students – and are paying them through payroll, then they should be included in 51000/52000 Employee Compensation and Benefits. If you are cutting them a check separately and treating them as a vendor or consultant, then they should be included in 53000 Professional & Technical Services.

**Supplement Not Supplant:** Please note that when there is a position in the budget that was not in the previous year’s budget, it raises questions of supplanting (see “Supplement Not Supplant” in Section I).

* If it is a new position, then it would be *allowable*.
* If it is not a new position, but the 21st CCLC grant responsibilities are new to the position, then it would be *allowable.*
* If it is not a new position and you used a different funding source to pay for a position last year, it *may be allowable*, if there are extenuating circumstances, such as:
* The other funding source is no longer available.
* The position would be eliminated if the 21st CCLC grant did not exist.
* The nature of the position has changed. It is now focused on the grant when it did not used to be.
* However, if it is not a new position and you used a different funding source to pay for a position last year, and nothing else changed, then it is *not allowable* to switch it to being paid out of 21st CCLC funds. That would be considered supplanting.

Please include information in the budget narrative that clarifies that the position is allowable.

## Categories 53000/54000/55000 Purchased Services

* **53000 Professional & Technical Services** is for temporary contracted services, evaluations & testing, legal, audit, food for travel to conferences, training & professional development services.
* **54000 Property Services** is for cleaning, repairs and maintenance, utilities, rentals, telephone, internet & wireless.
* **55000 Other Services** is for services such as transportation, insurance, advertising, printing, tuition, travel & hotel expenses related to attendance at trainings.

For budget requests that contain multiple items under a single heading, such as After-School Programming Providers, please include the following in the description or justification columns of the budget and/or in the budget narrative:

* If you know who your providers will be, your description should include the anticipated amount per provider, how the amount is determined (e.g., flat rate or hourly rate), and the number of students to be served by each provider.
* If you do not yet know who your providers will be, your description should include the process by which you choose providers, the typical range of contracted amounts, the typical number of providers chosen, and finally the anticipated numbers of students to be served by each provider.

## Category 56000 Supplies & Materials

This category is for consumables and general supplies, including program supplies or office supplies, books, purchased curricula, and maintenance supplies. For budget items that contain multiple items under a single heading such as program supplies or office supplies, grantees should include the following in their written description/justification:

* If you mostly know what items you will be buying, your description should include the actual amounts to be spent. You can group together generic items such as paper, pens, post-it notes, etc. as long as the total amount is under $1,000.
* If you mostly do not know what specific items you will be buying, your description should include whatever planning values you use (e.g., cost per student, average expenditures in the past) along with examples of some of the higher dollar amount items that are typically purchased in the category.

## Category 57000 Property & Equipment

This category is for furniture, technology – hardware & software, and other equipment. Although federal guidance technically defines equipment as purchases of $5000 or more, for the purposes of RIDE budget requests, please include smaller non-consumable items, particularly electronics, in this category. Purchases of equipment must be reasonable in cost and necessary to furthering the goals of the 21st CCLC. Use of the equipment must be limited to the 21st CCLC only and cannot be shared with students or other users during school hours, unless other funding sources are used (see bullet on Allocable expenses in “Guiding Principals” in Section I). Please provide an affirmation in the budget narrative that any equipment will be:

* used exclusively by the grant (or proportionately if costs are shared with another funding source),
* tagged accordingly,
* stored securely, and
* inventoried annually.

Equipment purchases are not typically approved during the final year of the grant.

## Category 58000 Miscellaneous

This category is for things that do not fall under any of the above categories. For 21st CCLC this category should be used for dues & fees for professional organizations and very little else.

## Category 60000 Indirect

If you take an indirect fee, it should be calculated not on the full amount of your grant, but instead as a percentage of eligible expenditures. Eligible expenditures are all items in categories 51000, 52000, 56000, and 58000. The first $25,000 of each contract in categories 53000, 54000, and 55000 is also eligible. No expenditures in category 57000 or 60000 are eligible.

* School districts, charter schools, and community-organizations that have a federally-negotiated indirect rate agreement, may use that rate – or a lower rate, if you prefer. Also, please make sure that RIDE has a copy of your most recent indirect rate agreement.
* Alternatively, if you do not have a negotiated rate and have never had a negotiated rate, then you can use the federal default rate of 8%. [34 CFR §§76.563 and 76.564].

## Unallowable Expenses

21st CCLC subgrant funds may not be used for:

* Religious worship, instruction, or proselytization [ESSA §8505]
* Construction or facility purchase or repair [ESSA §8526(1)]
* Materials or programs “designed to promote or encourage sexual activity” [ESSA §8526(3)]
* Distributing legally obscene materials [ESSA §8526(4)]
* Sexuality- or HIV-education that is not age appropriate and that does not include the health benefits of abstinence [ESSA §8526(5)]
* Distributing contraceptives [ESSA §8526(6)]
* Provision of, or training in the use of, a dangerous weapon. This prohibition does not apply to the use of funds for activities that are otherwise permissible and that “provide students with educational instruction or educational enrichment activities, such as archery, hunting, other shooting sports, or culinary arts.” [ESSA §8526(7), as amended by §13401 of the Bipartisan Safer Communities Act of 2022]
* Promotional items and memorabilia, including models, gifts, and souvenirs [2 CFR §200.421(e)(3)]
* Advertising designed solely to promote the grantee organization [2 CFR §200.421(e)(4)]
* Alcoholic beverages [2 CFR §200.423]
* Entertainment [2 CFR §200.438]
* Organized fundraising, including financial campaigns, endowment drives, and solicitation of gifts and bequests [2 CFR §200.442]
* Goods or services for personal use of employees [2 CFR §200.445]
* Lobbying or any attempt to influence enactment or modification of any pending federal or state legislation [2 CFR §200.450]

**Gift cards:** While not explicitly prohibited by federal regulations, gift cards are not allowable for this grant, due to the difficulties with maintaining proper fiscal controls with their use.

**Field trips:** Please note that field trips are only allowable if they serve a clear educational/programmatic purpose. Otherwise, they are considered to be entertainment and are thus unallowable. Justification should be provided in the budget narrative for all field trips planned. It is strongly recommended that you create a lesson plan for each field trip and keep a copy of it on file.

**Food:** Food is not allowable for non-programmatic activities (e.g., staff meetings, professional development events, etc.) with the exception of out-of-state travel (e.g., for conferences). It may be allowable for activities for youth or families, if it serves a programmatic purpose and is necessary for the success of the activity. 21st CCLC grantees are expected to rely on the USDA snacks and meals programs as much as possible for food. If requesting 21st CCLC funds for food, please include a justification for it in the Budget Narrative and explain why the need cannot be covered by the USDA snacks or meals programs. Snacks purchased for students outside of the USDA snack/meal programs should be healthy options in accordance with the [*National Afterschool Association Health Eating and Physical Activity Standards*](https://naaweb.org/all-documents/37-hepa-standards-2-0/file)*.*

**Potential “dangerous weapons”:** Federal legislation changed in October 2023, specifically allowing the use of funds for activities like cooking/culinary, archery, hunting safety, and gun safety programs, including ones that are part of many JROTC programs.

**Clothing:** T-shirts and other clothing are generally not an allowable expense with this grant. The one exception is that they may be allowable if they serve an explicit safety purpose (e.g., identifying program participants on a field trip). Purchasing clothing for branding or as promotional materials is not allowed.

**Incentives:** Incentives for program participation are allowable, but they must be nominal in value. Cash, stipends, and gift cards are not allowable incentives.

**Student stipends:** These are an allowable expense, but simply providing a stipend for attending the program is *not* allowable. Students must produce some kind of deliverable or provide a service for stipends to be allowable, which should be outlined in the budget narrative. There must be some tangible benefit to others or to the program.

**Scholarships/memberships:** Providing students with scholarships for college or to cover costs or fees for other programs that are not directly part of the 21st CCLC offerings is generally not allowable. However, funds may be used to cover costs for memberships or fees for programs that are necessary for students to participate in a 21st CCLC offering. In fact, such fees should be covered or waived in order to eliminate any potential financial barriers to full participation in the grant and its offerings. In those cases, however, funds should go directly to the organization charging them and should not be provided directly to students or families.

**School-day activities:** Because federal statute specifically requires that 21st CCLC services for K-12 students be provided outside the regular school day or during periods when school is not in session, 21st CCLC funds may not be used for services that take place during regular school hours. The one exception to this is services that target pre-kindergarten children and/or adult family members. Planning, coordination, and administrative tasks that support the grant are also allowable during school hours.

# III. Program Income

Any program income earned as a result of the subgrant requires prior approval from RIDE. “Program income includes but is not limited to income from fees for services performed, the use or rental of real or personal property acquired under Federal awards, the sale of commodities or items fabricated under a Federal award, license fees and royalties on patents and copyrights, and principal and interest on loans made with Federal award funds” [[2 CFR §200.1](https://www.ecfr.gov/cgi-bin/text-idx?SID=19a54ffd1ea5e8e6153b196edcd2c0ff&mc=true&node=se2.1.200_11&rgn=div8)]. Program income does not include donations, but it may include fundraisers where 21st CCLC funds were used (e.g., for supplies or staff time).

The following requirements apply to all program income earned:

1. Program income must be used for the same purposes and under the same conditions as the 21st CCLC subgrant, in accordance with all of the same applicable statutory and regulatory requirements, and in alignment with the goals, objectives and program design of the original approved application.
2. Program income must be used to supplement, enhance, or otherwise improve 21st CCLC programming for students and families, and not to supplant other funding sources.
3. Program income must be tracked separately in the subgrantee’s accounting system.
4. Program income must be utilized during the subgrant period of performance (i.e., the state fiscal year). Any generated program income must be spent down before requesting reimbursement from RIDE for 21st CCLC-related expenses. Program income may not be carried over to the next fiscal year.

Any generated program income which does not adhere to the above requirements, or for which a subgrantee has not requested prior approval, ***will result in a reduction of the federal subgrant award*** by an amount equal to that of the unapproved income generated.

**New! Fees charged to families:** After June 30, 2024, no 21st Century CLC may charge fees to students or families for participation in any service, activity, or event funded through the 21st CCLC grant. FY24 is the final year that fees will be allowed and only for grantees that have previously been charging them. As always, if fees are charged, sliding scales and/or scholarships must be provided and under no circumstances may a child be turned away due to inability of their family to pay fees. The availability of sliding scales and/or scholarships must be communicated in a transparent manner to families, so that no child is inadvertently turned away because the family is unaware.

After the fiscal year is over, you must submit to RIDE the *Annual Program Income Report* form, which lists the amount of program income that you earned and how those funds were expended.

**Childcare programs licensed through the Department of Human Services (DHS) and** **Child Care Assistance Program (CCAP) reimbursements***:* While braiding this funding stream with 21st Century Community Learning Center funding makes sense in theory, in practice it can be challenging. Because fees will no longer be allowed for 21st CCLC but a fee structure is inherent in the CCAP reimbursement system, for a 21st CCLC and a licensed childcare site to be co-located, there must be clear fiscal firewalls between the two. The two could be run at mutually exclusive times. For example, licensed childcare could be used as aftercare for students who need to stay after the 21st CCLC-funded program ends, provided that the timing or logistics of this do not act as a barrier to participation in 21st CCLC activities. If the two programs are occurring simultaneously, however, then they must take place in separate program spaces with separate staff, using separate supplies, materials, and equipment. In this scenario, any program directors or other staff who manage both programs would need to have their salary allocated to each funding source proportionate to the amount of time they spend on each program.

# IV. Annual Fiscal Cycle

21st Century Community Learning Center grants in Rhode Island are typically 5-year grants. The program operates on the state fiscal year which runs from July 1st through June 30th.

## Budget Submission & Approval

The annual process begins in the spring, when you develop your budget and submit it along with the budget narrative to RIDE, either as part of the initial application in response to the Request for Proposals (Year 1) or as part of the Annual Plan (Years 2 to 5). In either case, the budget and narrative must be reviewed and approved by both RIDE programmatic staff and RIDE fiscal staff, who may ask for clarifications or revisions to the budget. Once any and all issues or concerns have been addressed, ideally before the start of the new fiscal year, RIDE will notify you that your budget has been approved. Once this has happened, you are allowed to spend funds under the new budget, beginning on July 1st or the date that the budget has been approved, whichever is later.

If your budget has not been approved before July 1st, you may request a Letter of Substantial Approvability, which essentially says that RIDE staff have performed a preliminary review and did not find any immediate, major concerns or unallowable expenses. This letter allows you to begin spending funds, beginning on July 1st, even if the budget has not been fully approved.

It is strongly recommended that you keep a record of RIDE’s budget questions and revisit them when creating a new budget in following years, to avoid rehashing the same issues again.

## Grant Award Notification (GAN)

Once your budget has been approved, RIDE will issue a Grant Award Notification. Please review the GAN carefully. This document serves as confirmation that you have the grant, provides official information about the grant, and outlines various terms and conditions that apply.

## Spending Funds & Invoicing RIDE

Grantees must set up their financial system to track expenditures that are charged to the 21st CCLC grant separately from other expenses.

The grant operates on a reimbursement basis only; RIDE does not prepay any expenses. Invoicing should occur at least quarterly but may occur as frequently as weekly. To submit an invoice, please fill out the *Financial Status Report and Cash Reimbursement Form* (FSR) and submit it to RIDE’s Office of Finance. Please note that you must submit this form at least quarterly – even if you did not have any grant expenses. For the last reimbursement request of the year, there is a separate *Preliminary June 30th Financial Status Report and Cash Reimbursement Form*, which is typically due about one week after the end of the fiscal year which should include all encumbrances and payroll accruals for goods and services received prior to June 30th that have not been paid. A final bill is typically due in mid August, using the usual FSR form. The Final Report includes only actual expenditures; encumbrances/accruals must be excluded. If you can fully close out with no further encumbrances/accruals by the Preliminary FSR deadline, you can skip the Preliminary FSR and just submit the final one.

Under no circumstances may you charge expenses to the budget that happened outside of the budget period (i.e., the state fiscal year). For example, you should not charge any salary for an employee’s time worked prior to the start of the fiscal year.

## 10% Flexibility Rule

In general, you should spend funds according to your RIDE-approved 21st Century Community Learning Center grant budget, with drawdowns occurring at least quarterly. You have flexibility to expend funds outside of the approved budget series amounts, if all of the following are met:

* All expenditure change(s) will not increase the total approved budget.
* The cumulative change(s) within or among objects of expenditure does not exceed 10% of your total approved budget.
* No spending occurs in a new budget category (i.e., that category was $0.00 in your approved budget).
* Equipment is not increased by more than $5,000.00.
* The change(s) do not alter the scope, goals, operational or staffing structure, and/or intent of the currently approved program.
* There will be no supplanting as a result of the change(s) (see “Supplant not Supplant” in Section I).
* All changes are allowable and are in compliance with the federal Uniform Grant Guidance ([2 CFR § 200](http://www.ecfr.gov/cgi-bin/text-idx?SID=6214841a79953f26c5c230d72d6b70a1&tpl=/ecfrbrowse/Title02/2cfr200_main_02.tpl)) and 21st Century Communities laws and regulations. Any change that is later determined not to have been allowable cannot be paid with grant funds.

If you seek to make any changes to your budget outside of these parameters (e.g., you need to move more than 10% of your budget between budget series), then you would need to submit a budget amendment.

## Carryover (15% Maximum)

You should make every effort to spend your funds during the fiscal year. However, you may carry up to 15% of your initial yearly budget (i.e., not including any carryover) into the next fiscal year. The one exception is that grants that are in their final year (i.e., Year 5 of 5) may not carry over funds into the next fiscal year. If you know that you have carryover, you should plan accordingly but please be aware that official carryover amounts are calculated by RIDE in the fall and that these amounts may vary somewhat from your own calculations. Carryover is not automatically applied to your grant award; you must apply for carryover as part of a budget amendment process.

## Budget Amendments

RIDE typically only accepts one budget amendment per year which is submitted in January or February, although exceptions are sometimes made on a case-by-case basis. A budget amendment consists of:

1. A revised *Budget* form
2. A revised *Budget Narrative* form
3. An *Increase/Decrease* form, which outlines overall changes in each budget series.

Once you have submitted the budget amendment, it goes through a review and approval process similar to your original budget, ending with the creation of a new Grant Award Notification.

# V. Financial Management

Federal guidance places a strong emphasis on establishing written policies and procedures to ensure operational effectiveness and fiscal accountability, reliability, and integrity.

## Subcontracts

All 21st CCLC subgrantees should have a detailed procurement policy which outlines procedures for making purchases of different dollar amounts. The policy should include:

* Threshold dollar thresholds or other conditions that require different procurement types (e.g., items that can be purchased directly, those that require getting quotes, those that should be put out to bid, etc.),
* How bids are to be evaluated,
* When/if sole-source contracts are acceptable, and
* How many people and which roles/titles are required to approve contracts and payments.

Other requirements of procurement policies (e.g., around avoiding real or apparent conflicts of interest, avoiding unnecessary purchases, providing for full and open competition, maintaining proper records, encouraging the use of WMBEs, preferring domestic products, etc.) can be found in the Procurement Standards section of the federal Uniform Guidance [[2 CFR §§200.317-200.328](https://www.ecfr.gov/cgi-bin/text-idx?SID=a3a33f2ac61d52352d011f60ff86ce8f&mc=true&tpl=/ecfrbrowse/Title02/2cfrv1_02.tpl#200)].

When external providers are used for 21st CCLC program activities, a formal contract or memorandum of understanding/agreement should be created which, for accountability purposes, specifies tasks and/or deliverables to be provided.

Subgrantees should have a written policy to ensure that vendors paid using federal funds are not debarred or suspended, or otherwise excluded from or ineligible for participation in Federal programs. At a minimum, this should encompass contracts of $25,000 or more. Please use the [www.sam.gov](http://www.sam.gov) website for this process.

## Time and Effort

Federal regulations require that subgrantees have a system in place to document the percentage of time employees actually work on any federal grant – as opposed to the percentage of time originally budgeted.

* For staff working 100% on one cost objective (e.g., working on one 21st CCLC grant), this can be a semi-annual certification that 100% of the employee’s time was spent on that objective.
* For staff split between programs and/or who are paid in part with other funds, this could be a timesheet system, indicating the amount of time spent on each program. It could also be a periodic, signed time distribution report of hours spent on each program.

There should also be a general system is in place to track staff attendance.

## Property & Equipment

A policy should be in place to protect fixed assets (i.e., property and equipment) which should include all, non-consumable items, particularly electronics (not just purchases of $5000 or more which is how federal guidance defines equipment). Property records should be maintained and should include the description, serial #, source, name on title, acquisition date, cost, percentage of federal funds used, location, use, condition, and disposition data including date and sale price if sold. Equipment should be labeled to denote that it was purchased with 21st CCLC funds and is intended exclusively for use by the program – or proportionately, if purchased in part with multiple funding sources. Equipment should be stored securely when not in use. Physical inventories of program equipment should be conducted at least bi-annually, and preferably annually.

## Other Policies

Other fiscal policies that should be in place including, but not limited to:

* Establishing and maintaining internal controls over federal grants,
* Retaining financial and programmatic records,
* Evaluating and monitoring compliance with federal statutes and regulations and the terms of federal grant awards,
* Taking prompt action when instances of noncompliance are identified, and
* Safeguarding protected personally identifiable or other sensitive information.

## Audits

[Uniform Guidance, Part 200, Subpart F](https://www.ecfr.gov/cgi-bin/text-idx?SID=443a2e5e9cae0132f0cd83cf7a541082&mc=true&node=sp2.1.200.f&rgn=div6) requires that subgrantee organizations have a federal compliance Subpart F audit performed if more than $750,000 in Federal funds was spent during the fiscal year [2 CFR §200.425(a)(2)]. It also requires that the Single Audit be submitted to the Federal Clearinghouse either 30 days after receiving the audit report or nine months after the end of the entity’s fiscal year, whichever comes earlier, unless an extension has been granted by a cognizant agency before this deadline.