



FISCAL
D06 – D09

FEDERAL TITLE PROGRAMS
MONITORING
2024-2025

Submission D06 – Inventory, Tracking, and Labeling of Equipment and Supplies

The Office of Management and Budget (OMB) Uniform Grant Guidance (UGG) §200.33 defines regulations on the inventory, tracking, and labeling of equipment and supplies. Districts must provide evidence and documentation to show compliance with these regulations. **Label as Submission D06.**

- ☐ Submit a copy of each federal Title program's inventory.
- ☐ Submit a narrative that details the district's process to inventory, label, and track materials, supplies, and equipment.
- ☐ A physical inventory of the equipment must be taken, and the results must be reconciled at least once every two years.
- ☐ An internal control system must be in place to ensure adequate safeguards to prevent loss, damage, or theft. Any loss, damage, or theft must be investigated.

Requirement

Inventory

The Office of Management and Budget (OMB) Uniform Grant Guidance (UGG) §200.33 defines the regulations on the use of federal funds for permanent fixtures such as equipment and furniture. Federal Title programs are required to label each item purchased with federal funds. In addition, federal Title programs must keep an inventory of all equipment and furniture (filing cabinets, bookshelves, etc.) items purchased with federal Title funds with a value of \$5,000 or more.

Districts that expend federal funds on equipment (over \$5,000) are required to maintain an inventory system that includes the following:

1. Description of the equipment.
2. Serial/identification number.
3. Title holder (if applicable).
4. Acquisition date.
5. Acquisition cost and percentage of federal participation in cost of equipment.
6. Location of equipment.
7. Condition of the equipment.
8. Ultimate disposition data (including date of disposal and sale price, if applicable).
9. Funding source (including the federal award identification number (FAIN)).

Districts must keep all items on the federal Title inventory for five years. After five years, the items lose their identity as purchased with federal Title funds and then belong to the public school district. The district has the authority to use or dispose of the items as they see fit as long as it is recorded under disposition data. The equipment inventory will be reviewed to see that all equipment is being used primarily for the federal Title program under which it was purchased.

Inventory/Tracking/Labeling Process

The district must also ensure that all materials, supplies, equipment, and furniture (non-consumable items) purchased with federal funds, no matter the item's value, are labeled as purchased with federal Title funds. In addition, all equipment purchased with Title I funds for targeted assistance programs and private school programs must be located in and kept in the Title I room. The narrative will be reviewed to ensure that the district has a consistent process to inventory, label, and track materials, supplies, and equipment.

Documentation

See subsequent page.

Key Definitions:

- Equipment
 - Tangible property (including information technology systems) having a useful life of more than one year and a per-unit acquisition cost that equals or exceeds \$5,000.
Note: These items will require prior written approval for Capital Expenditures SFN 61974 (in WebGrants).
 - Equipment acquired using federal funds must be labeled/tagged/inventoried, indicating the specific federal funds that were utilized.
- Supplies
 - Tangible property that is not equipment. A computing device is a supply if the acquisition costs is less than \$5,000, regardless of the length of its useful life.
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 - Expendable items that are consumed, worn out, or deteriorated in use: freight, books, school supplies, periodicals/subscriptions, software, software applications, food for parental engagement activities, snacks for after-school programs, etc.
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 - These items acquired using federal funds must be labeled/tagged, indicating the specific federal funds that were utilized.
- Disposition
 - When there is a residual inventory of unused supplies exceeding \$10,000 in aggregate value at the end of the period of performance, and the supplies are not needed for any other Federal award, the recipient or subrecipient may retain or sell the unused supplies. Unused supplies means supplies that are in new condition, not having been used or opened before. The aggregate value of unused supplies consists of all supply types, not just like-item supplies. Disposition of the supplies needs to follow the requirements set out in 2 CFR 200.314 (a).
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 - When equipment purchased with federal program funds can no longer be used for the originally authorized purpose or for other activities currently or previously supported by the federal government, the disposition of the equipment needs to follow the requirements set out in 2 CFR 200.313 (e), 2 CFR 200.313 (e)(2).

Resources

- [eCFR :: 2 CFR Part 200 Subpart D -- Post Federal Award Requirements](#)
- [Object Code Categories](#)
- [North Dakota School District Financial Accounting and Reporting Manual \(NDSDFARM\)](#)
- [Capital Expenses](#)
- [Criteria for Distinguishing Equipment from Supply Items](#)
- [2 CFR 200.313 Equipment](#)
- [2 CFR 200.314 Supplies](#)

Sample Documentation – Submission D06 – Inventory

XYZ Public School District

Inventory of items purchased with federal Title funds as required by UGG §200.33.

Funding Source/FAIN	Description of Equipment	Serial Number	Acquisition Date	Acquisition Cost/Percentage of Funds	Location of Equipment	Disposition Data
S010A220034	iMac Computer	C050200195	8/3/2022	\$247.40 (50%)	Title I District Collaboration Room	
S424A220035	iMac Computer	XB8270AACT9	1/1/2022	\$1,499.00 (100%)	Science Lab	
S010A210034	Chromebook	2005-008372	7/15/2021	\$450.00 (100%)	Title I Room	Transferred to district PK program 7-2022 (\$150)

Submission D07 – Purchase/Contract/Procurement

- ☐ Submit a copy of district purchase/contract/procurement policies. **Label as Submission D07.**
Purchase orders and invoices must meet requirements 1-4 listed below:

1. Properly coded to the federal Title program
2. Appropriate federal Title program expenditures
3. Incurred during the appropriate fiscal year
4. Current and available for review

Requirement

When using federal Title funds for allowable purchases supporting the federal Title programs, the district's business office must have a fiscally sound process in place that includes elements such as:

- Staff must clearly understand how to requisition materials/supplies/equipment for the program.
- Process for securing purchases.
- Process for tracking purchases back to each federal Title program funding source (Unique federal Title program coding identified on purchase orders and invoices).
- Process for inventorying materials/supplies/equipment upon arrival at the school.

Districts must be mindful of the following when purchasing supplies, materials, equipment, services, etc. with federal Title program funds:

- Purchases and expenditures must be appropriate and allowable to each federal Title program.
- Purchases must be incurred during the project period of the awarded grant.
- Purchases must be recorded on the district's local accounting ledger.
- State or local funds used to support the federal Title program must be tracked separately.
- Purchases must supplement and not supplant the district's local fiscal and educational responsibility.
- Districts must, upon request, be able to provide supporting documentation (e.g., receipts, requisitions, vouchers, contracts, invoices, etc.) for the expenses

Districts should have a contract/procurement policy in place with a threshold of when a contract/procurement is required. If funds are being used to purchase a service that requires a contract, the contract must, at a minimum, include:

- Scope of services.
- Duration of the contract.
- Method and amount of payment.
- Execution by both parties.

Additionally, districts must ensure they do not enter into a contract or sub-grant with any vendor that is debarred, suspended, or ineligible for participation in federal programs by:

1. Checking the Excluded Parties List (EPLS) in the [System for Award Management](#) (SAM),
2. Collecting a certification from the vendor and attaching it to the contract, or
3. Adding a clause or condition to the contract which indicates the vendor is eligible.

If the district is paying a vendor with federal funds in which procurement or a contract is required, the contract must show exactly how the funds will be used to demonstrate that the services are appropriate for the program. A document that sets forth the specific goods and services purchased with the district's federal funds proves to auditors and the USDE the intentions for spending federal funds.

Other Federal Programs and Competitive Grants: Districts that receive federal funds through competitive grants or formula programs must have fiscally sound processes in place to manage funds, including but not limited to purchasing, procurement, cash management, and sound budget practices.

Districts must follow NDCC 15.1-09-34, which addresses contracts by school boards.

Documentation

District Policies

Resources

- [Tracking Federal and Local Funds](#)
- [Object Code Categories](#)
- [NDCC 15.1-09-34](#)
- [System for Award Management \(SAM\)](#)
- NDSBA Policy
 - HBAA Federal Fiscal Compliance
 - HCAA Purchasing Policy

Submission D08 – Records Retention

- ☐ Submit district records retention policy, records retention schedule, and documentation that it has been followed and signed off annually. This requirement refers to the Records Retention Policy and Annual Policy Review of financial records, supporting documentation, statistical documents, and other entity records pertinent to a federal award. **Label as Submission D08.**

Requirement

The district must retain financial records, supporting documents, statistical documents, and all other entity records pertinent to a Federal award for three years from the submission date of the final expenditure report. For Federal awards that are renewed quarterly or annually, the district must retain financial records from the date of submission of the quarterly or annual financial report, respectively, as reported to NDDPI. Although not required by federal regulations, best practice is for districts to have a records retention policy and documentation that the policy has been followed annually.

Documentation

- Record Retention Policy
- Record Retention Schedule
- Annual Policy Sign Off

Resources

- [NDCC15.1-07-25.2](#)
- [NDSBA Policy](#)
 - [ABCD Records Retention Policy](#)
 - [ABCD-E1 Records Retention Schedule](#)
 - [ABCD-E2 Resolution of Record Destruction](#)

Submission D09 – Time & Effort Documentation

All federally funded personnel (coordinators, instructional coaches, class size reduction, etc.) must have time and daily duties documented (in print) either through a fixed schedule or a time and effort log.

- ☐ Submit a copy of fixed schedules and/or time logs and assurances of time for all personnel paid with federal funds.
- ☐ Submit a copy of a signed assurance from the individual(s) with direct knowledge of duties performed for all personnel paid with federal funds, documenting the percentage of time (must equal 100%) paid with federal and nonfederal funds for each federal program. Note: Signing and dating of assurances must be after the time has elapsed.

Label as Submission D09.

Requirement

The federal law requires all individuals being paid with federal funds to document their time and effort put forth for that federal program, no matter the percentage of time they are paid. District expenditures of federal funds for employee salaries and wages must be based on records that accurately reflect the work performed.

Time and effort records must:

1. Be supported by a system of internal controls that provides reasonable assurance that charges are accurate, allowable, and properly allocated;
2. Be incorporated into official district records;
3. Reasonably reflect total activity for which the employee is compensated by the District;
4. Encompass 100% of all activities (federal and non-federal) compensated by the District;
5. Comply with the District's established accounting policies and practices; and
6. Support the distribution of the employee's salary or wages among specific activities or cost objectives if the employee works on more than one federal award.

The first five criteria listed above may be satisfied through payroll, accounting, and related systems. The last criterion applies when an employee distributes time among multiple programs. An employee dedicating 5% of their time to a federal program must document their time and effort, just as an individual employed 100% in a federal program would have to document their time and effort.

Documentation

An excellent internal control measure for this would be daily logs or a permanent schedule and a supervisor assurance monthly or semi-annually. Employee certifications are not required when a district has other records that can satisfy the criteria above; however, districts may continue to use employee certifications as an internal control.

The type of documentation you will be responsible for depends on the type of position held. Use the chart below to determine the best documentation for your position.

Position	Permanent Schedule	Semi-Annual Assurance	Daily Log	Monthly Assurance
Title I Teacher (fixed schedule)	X	X		
Title I Teacher (variable schedule)			X	X
Data Coordinator			X	X
School Improvement/Schoolwide Coordinator			X	X
Reading/Math Coach (fixed schedule)	X	X		
Reading/Math Coach (variable schedule)			X	X

Sample Documentation – Submission D09 – District Personnel Time & Effort Documentation – Permanent Schedule

A permanent schedule is most often used for teachers, paraprofessionals, or individuals who are being paid with federal funds and hold a fixed schedule every day of the week. For instance, a Title I teacher's schedule could document that they are being paid 100% with federal funds and 100% of their day is dedicated to Title I programming. A teacher who is 50% Title I (paid with Title I funds) and 50% reading coach (paid with local funds) could also use this method if their schedule is consistent day after day. Permanent schedules should be on file and updated throughout the school year.

Teacher Name: XYZ Teacher

School Name: XYZ Elementary School

Position: 50% Title I Teacher and 50% Reading Coach

Time Slots	Students Worked With (List names of students served during this time slot)	Subjects Covered (Reading, math, or other subjects. Give a description of skills in the subject area.)	Grade Level
8:30-9:00	All	Reading	Grade 4
9:00-9:30	XYZ Student(s)	Reading	Grade 3
9:30-10:00	XYZ Student(s)	Reading	Grade 2
10:00-10:30	XYZ Student(s)	Reading	Grade 1
10:30-11:00	XYZ Student(s)	Reading	Grades 5 & 6
11:00-11:30	All	Reading	Grade 3
11:30-12:00	All	Reading	Grade 2
12:00-1:30	Lunch and Prep		
1:30-2:00	All	Reading	Grade 1
2:00-2:30	XYZ Student(s)	Reading	Grade 4
2:30-3:00	All	Reading	Grades 5 & 6
3:00-3:30	Prep		

Sample Documentation – Submission D09 – District Personnel Time & Effort Documentation – Daily Log, Monthly Assurance, or Semi-Annual Schedule

Individuals who work less than 100% of their time for a particular federal program and whose schedule changes daily, monthly, or semi-annually can log their time spent in the federal program. For instance, a principal paid 75% from the district for duties of the principal and 25% from Title I to coordinate the district's Title I program could keep a daily log of the time spent on principal duties versus Title I coordinator duties. An individual in this situation does not hold a fixed schedule, as principal duties are irregular and cannot be scheduled.

Please be mindful that time and effort documentation must:

- *Reflect an after-the-fact distribution of the actual service provided by the employee.*
- *Account for the total activity for which the employee is compensated.*
- *Be prepared at least monthly and must coincide with one or more pay periods.*
- *Be signed by the employee. (optional)*

School District: XYZ School District			School: XYZ Elementary School
Name of Staff Member: XYZ, Title I Coordinator			Name and Title of Supervisor: XYZ, Title I Supervisor
Date of Service	Time	# of Hours	Scope of Service
August 15, 2024	3:00 pm – 5:00 pm	2	Coordinated review of student selection procedures for all Title I schools
August 25, 2024	8:00 am – 3:00 pm	7	Met with each Title I building staff to review caseloads and upcoming school year
August 30, 2024	3:00 pm – 5:00 pm	2	Prepared materials for upcoming parent meeting
September 1, 2024	3:00 pm – 5:00 pm	2	Facilitated Title I fall parent meeting
September 15, 2024	5:00 pm – 6:00 pm	1	Individualized meeting with a concerned parent
Total Hours			14

Employee Signature (optional)

*Date**

Supervisor Signature

*Date**

**Signatures must be dated AFTER the last date of service.*

Sample Documentation – Submission D09 – Assurance of Time

PUBLIC SCHOOL DISTRICT Time & Effort Assurance

- The district must submit documentation of the employee's time and effort paid for with federal funds.
- This sample time and effort assurance form may be used when multiple individuals are supervised by one constant individual with direct knowledge of the work performed.
- The following staff have spent the noted FTE % of their time towards instructional activities (Must encompass 100% of staff time, both federal and nonfederal).

Employee (First/Last)	Start Date (mm/dd/yyyy)	End Date (mm/dd/yyyy)	FTE %	Fund Source

I certify that the above accurately represents the work performed during the time period shown.

Principal/Supervisor Name

*Signature**

*(*signature must be dated AFTER the last date of service)*

*Date**

