



**KEYSTONE OAKS SCHOOL DISTRICT**  
**1000 Kelton Avenue**  
**Pittsburgh, PA 15216**

**BOARD OF SCHOOL DIRECTORS**

**BUSINESS/LEGISLATIVE MEETING**  
**TUESDAY, AUGUST 18, 2020**  
**7:00 PM**

**KEYSTONE OAKS SCHOOL DISTRICT  
SCHOOL DIRECTORS' CALENDAR OF COMING EVENTS**

**August 18, 2020 – Business/Legislative**

**7:00 PM Meeting**

- Call to Order – President
- Pledge of Allegiance
- Public Comment
- Approval of Reports
- Public Comment
- Adjournment

**September 8, 2020 –Work Session**

**7:00 PM Meeting**

- Call to Order – President
- Pledge of Allegiance
- Public Comment
- Review of Reports
- Public Comment
- Adjournment

# **BOARD PRESIDENT'S REPORT**

**August 18, 2020**

**Ms. Patricia A. Shaw**

## **BOARD ACTION REQUESTED**

### **I. BOARD MINUTES**

It is recommended that the Board approve the Special Voting Meeting Minutes of July 14, 2020.

### **II. ADOPTION OF THE REVISED 2020/2021 SCHOOL YEAR CALENDAR**

It is recommended that the Board adopt the revised 2020/2021 school year calendar as presented by the Superintendent (*Pages 6-7*).

### **III. 2020/2021 EDUCATIONAL PLAN**

In compliance with the Pennsylvania Department of Education and the Pennsylvania Public School Code and in response to the COVID-19 global pandemic, it is recommended that the Keystone Oaks School Board approve the following Educational Plan for the 2020/2021 school year:

1. All students will be held accountable for a minimum of 180 days of school attendance which will be tracked whether the students are attending face-to-face, through synchronistic learning, or through asynchronistic learning in the Keystone Oaks Cyber Academy. The revised school calendar adopted on August 18, 2020 will remain in effect, which reflects 182 days of instruction for students.
2. All elementary students will receive a minimum of 900 hours of instruction (face-to-face, synchronistic, Keystone Oaks Cyber Academy).
3. All secondary students will receive a minimum of 990 hours of instruction (face-to-face, synchronistic, Keystone Oaks Cyber Academy).
4. All instruction that takes place, whether face-to-face, synchronistic, or through the Keystone Oaks Cyber Academy will be under the direction of a certified school employee.

#### **For Information Only**

The District's detailed Educational Reopening Plan from August 24, 2020 through October 30, 2020 is as follows:

#### **First day for teachers: Monday, August 24, 2020**

- Teachers' Professional Development: Monday August 24, 2020 through Thursday, August 27, 2020.
- Teachers' Clerical Day: To be taken between Friday, August 28, 2020 and Friday, September 4, 2020

**First Day for Students: Tuesday, September 8, 2020**

- The week of August 31, 2020, the Board will re-evaluate the COVID-19 threat in the county/community and will decide as to whether to start Instructional Options or to continue online learning for all students.
  - Instructional Options
    - 1: Two days per week of face-to-face instruction and three days of week of online instruction. Students will be divided alphabetically by last name.
    - 2: All synchronistic learning for those who chose this option, Monday through Friday
    - 3: Keystone Oaks Cyber Academy – students learn at their own pace and are monitored by District faculty.
  - Due to the number of students who selected Option 1 for instruction, the students must be separated into two (2) groups by last name (A-L and M-Z) so as to maintain social distancing (6-feet) on the buses, in the classrooms, and in other areas of the buildings.

**If the Board moves forward with the Options to begin on Tuesday, September 8, 2020, this is the weekly schedule through October 30, 2020:**

- **Week of September 7, 2020 through September 11, 2020**
  - Students (A-L): Face-to-Face instruction Tuesday and Wednesday  
Online instruction: Thursday and Friday
  - Students (M-Z): Face-to-Face instruction Thursday and Friday  
Online instruction: Tuesday, Wednesday
- **Week of September 14, 2020 through September 18, 2020**
  - Students (A-L): Face-to-Face instruction Monday and Tuesday  
Online instruction: Wednesday, Thursday, Friday
  - Students (M-Z): Face-to-Face instruction Thursday and Friday  
Online instruction: Monday, Tuesday, Wednesday
- **Week of September 21, 2020 through September 25, 2020**
  - Students (A-L): Face-to-Face instruction Monday and Tuesday  
Online instruction: Wednesday, Thursday, Friday
  - Students (M-Z): Face-to-Face instruction Thursday and Friday  
Online instruction: Monday, Tuesday, Wednesday
- **Week of October 5, 2020 through October 9, 2020**
  - Students (A-L): Face-to-Face instruction Monday and Tuesday  
Online instruction: Wednesday, Thursday, Friday
  - Students (M-Z): Face-to-Face instruction Wednesday and Thursday  
Online instruction: Monday, Tuesday, Friday

Friday, October 9, 2020 is an Early Dismissal due to Act-80 Day

- **Week of October 12, 2020 through October 16, 2020**
  - Students (A-L): Face-to-Face instruction Monday and Tuesday  
Online instruction: Wednesday, Thursday, Friday
  - Students (M-Z): Face-to Face instruction Thursday and Friday  
Online instruction: Monday, Tuesday, Wednesday
  
- **Week of October 19, 2020 through October 23, 2020**
  - Students (A-L): Face-to-Face instruction Monday and Tuesday  
Online instruction: Wednesday, Thursday, Friday
  - Students (M-Z): Face-to Face instruction Thursday and Friday  
Online instruction: Monday, Tuesday, Wednesday
  
- **Week of October 26, 2020 through October 30, 2020**
  - Students (A-L): Face-to-Face instruction Monday and Tuesday  
Online instruction: Wednesday, Thursday, Friday
  - Students (M-Z): Face-to Face instruction Thursday and Friday  
Online instruction: Monday, Tuesday, Wednesday

**IV. MEMORANDUM OF UNDERSTANDING**

The Administration recommends that the Board approve the Memorandum of Understanding between the Keystone Oaks School District and the Keystone Oaks Education Association PSEA/NEA regarding instruction and re-opening during the 2020/2021 school year.

**V. HEALTH AND SAFETY PLAN CHANGE**

It is recommended that the Board approve the following changes to the Keystone Oaks School District’s Health and Safety plan as per the order from the Secretary of the Pennsylvania Department of Health on August 17, 2020. This order now requires that all students must wear face coverings at all times, and are only allowed to remove the face coverings when students are: Eating or drinking when spaced at least 6 feet apart; or  
When wearing a face covering creates an unsafe condition in which to operate equipment or execute a task; or  
At least 6 feet apart during “face-covering breaks” to last no longer than 10 minutes.

**FOR INFORMATION ONLY**

- |   |                           |
|---|---------------------------|
| I. Parkway West Career and Technology Center Report | <i>Ms. Annie Shaw</i>     |
| II. SHASDA Report                                   | <i>Mr. Santo Raso</i>     |
| III. PSBA/Legislative Report                        | <i>Mrs. Theresa Lydon</i> |
| IV. News from the Boroughs                          |                           |

**V. EXECUTIVE SESSION**

**KEYSTONE OAKS SCHOOL DISTRICT**  
**REVISED 2020-2021 SCHOOL CALENDAR**

August 2020				
Mo	Tu	We	Th	Fr
	3	4	5	6
10	11	12	13	14
17	18	19	20	21
24	25	26	27	28
31				

September 2020				
Mo	Tu	We	Th	Fr
	1	2	3	4
7	8	9	10	11
14	15	16	17	18
21	22	23	24	25
28	29	30		

October 2020				
Mo	Tu	We	Th	Fr
			1	2
			8	9
5	6	7		
12	13	14	15	16
19	20	21	22	23
26	27	28	29	30

November 2020				
Mo	Tu	We	Th	Fr
2	3	4	5	6
9	10	11	12	13
16	17	18	19	20
23	24	25	26	27
30				

December 2020				
Mo	Tu	We	Th	Fr
	1	2	3	4
7	8	9	10	11
14	15	16	17	18
21	22	23	24	25
28	29	30	31	

January 2021				
Mo	Tu	We	Th	Fr
				1
4	5	6	7	8
11	12	13	14	15
18	19	20	21	22
25	26	27	28	29

February 2021				
Mo	Tu	We	Th	Fr
1	2	3	4	5
8	9	10	11	12
15	16	17	18	19
22	23	24	25	26

March 2021				
Mo	Tu	We	Th	Fr
1	2	3	4	5
8	9	10	11	12
15	16	17	18	19
22	23	24	25	26
29	30	31		

April 2021				
Mo	Tu	We	Th	Fr
			1	2
5	6	7	8	9
12	13	14	15	16
19	20	21	22	23
26	27	28	29	30

May 2021				
Mo	Tu	We	Th	Fr
3	4	5	6	7
10	11	12	13	14
17	18	19	20	21
24	25	26	27	28
31				

June 2021				
Mo	Tu	We	Th	Fr
	1	2	3	4
7	8	9	10	11
14	15	16	17	18
21	22	23	24	25
28	29	30		

July 2021				
Mo	Tu	We	Th	Fr
			1	2
5	6	7	8	9
12	13	14	15	16
19	20	21	22	23
26	27	28	29	30

**First & Last Student Day**

**Early Dismissal(s) for Students**  
 (Professional Development/Act 80 for Staff)

**Early Dismissal(s) for Students**

**Professional Development**

**Holiday Dates – No School**

**Kennywood Picnic**

**Make-Up Days**

1. February 15, 2021
2. April 1, 2021
3. April 5, 2021

**KEYSTONE OAKS SCHOOL DISTRICT  
2020-2021 SCHOOL CALENDAR**

**STUDENT / TEACHER DAYS**

		<u>Month</u>	<u>Student</u>	<u>Teacher</u>
August 24, 25, 26, 27	Professional Development			
August 28	Clerical	August	0	5
September 8	First Day for Students	September	17	17
October 9	Early Dismissal for Students			
	(Professional Development/Act 80 for Staff)	October	22	22
November 3	Professional Development/Clerical			
	Election Day (No School)			
November 26-30	Thanksgiving Recess (No School)	November	17	18
December 24-31	Winter Recess (No School)	December	17	17
January 1	Winter Recess (No School)			
January 18	Professional Development/Clerical			
January 29	Clerical Day	January	18	20
February 12	Early Dismissal for Students			
	(Professional Development/Act 80 for Staff)			
February 15	Presidents' Day (No School)	February	19	19
		March	23	23
April 2 - 5	Spring Break			
April 5	Professional Development/Clerical	April	20	21
May 31	Memorial Day (No School)	May	20	20
June 10	Graduation			
June 11	Last Day for Students			
June 14	Last Day for Teachers/Clerical	June	9	10
			182	192

**FACULTY DAYS**

August 24, 25, 26, 27	Professional Development
August 28-September 4	Clerical (one day to be taken between these dates)
November 3	Professional Development/Clerical
January 18	Professional Development/Clerical
January 29	Clerical
April 5	Professional Development/Clerical
June 14	Clerical

**PARAPROFESSIONAL DAYS**

August 24	Professional Development
August 25	Professional Development
November 3	Training

**Kennywood Picnic**

To Be Determined

**END OF GRADING PERIODS**

November 10, 2020	End of First Grading Period
January 28, 2021	End of Second Grading Period
April 1, 2021	End of Third Grading Period
June 11, 2021	End of Fourth Grading Period

# SUPERINTENDENT'S REPORT

August 18, 2020

Dr. William P. Stropkaj

## **BOARD ACTION REQUESTED**

### **I. PROJECT SUCCEED CONTRACTS**

It is recommended that the Board approve the following school districts for participation in Project Succeed for the 2020/2021 school year:

Bethel Park School District  
Brentwood School District  
Carlynton School District  
Chartiers Valley School District  
Moon Area School District  
Mt. Lebanon School District  
Quaker Valley School District  
South Fayette School District  
West Jefferson Hills School District

### **II. FIRST READING POLICY 255: EDUCATIONAL STABILITY FOR CHILDREN IN FOSTER CARE**

It is recommended that the Board approve the FIRST READING of Policy 255: *Educational Stability for Children in Foster Care*.

### **III. FIRST READING POLICY 627: FEDERAL FISCAL COMPLIANCE**

It is recommended that the Board approve the FIRST READING of Policy 627: *Federal Fiscal Compliance*.

### **IV. FIRST READING POLICY 808: FOOD SERVICES**

It is recommended that the Board approve the FIRST READING of Policy 808: *Food Services*.

### **V. FIRST READING POLICY 819: SUICIDE AWARENESS**

It is recommended that the Board approve the FIRST READING of Policy 819: *Suicide Awareness*.

### **VI. ATTACHMENT NO. 627-AR-1: TYPES OF COSTS OBLIGATIONS PROPERTY MANAGMENT**

It is recommended that the Board approve the FIRST READING of Attachment No. 627-AR-1: *Types of Costs Obligations Property Management*.



**VII. ATTACHMENT NO. 627-AR-2: ALLOWABILITY OF COSTS**

It is recommended that the Board approve the FIRST READING of Attachment No. 627-AR-2: *Allowability of Costs*.

**VIII. ATTACHMENT NO. 627-AR-3: CASH MANAGEMENT**

It is recommended that the Board approve the FIRST READING of Attachment No. 627-AR-3: *Cash Management*.

**IX. ATTACHMENT NO. 627-AR-4: SUBRECIPIENT MONITORING**

It is recommended that the Board approve the FIRST READING of Attachment No. 627-AR-4: *Subrecipient Monitoring*.

**X. ATTACHMENT NO. 627-AR-5: PROCUREMENT**

It is recommended that the Board approve the FIRST READING of Attachment No. 627-AR-5: *Procurement*.

**XI. ATTACHMENT NO. 819-AR-1: SUICIDE PREVENTION RESOURCES**

It is recommended that the Board approve the FIRST READING of Attachment No. 819-AR-1: *Suicide Prevention Resources*.

**XII. PROFESSIONAL DEVELOPMENT**

It is recommended that the Board retroactively approve the following Professional Development requests:

<b>Shane Hallam</b>	Southern California AP Institute for AP Psychology (Virtual Meeting) August 3 – 6, 2020	\$550.00
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# EDUCATION REPORT

August 18, 2020

Mrs. Theresa Lydon, Chairperson

## **BOARD ACTION REQUESTED**

### **I. TEXTBOOK ON DISPLAY**

The Administration recommends that the Board approve that the following textbook be placed on display for 30 days:

**Textbook**

**Publisher**

*Temas*, AP Spanish  
(includes digital subscriptions)

Vista Higher Learning

*Themes*, AP French  
(includes digital subscriptions)

Vista Higher Learning

**For Information Only**

All textbooks will be available to review upon requests made to Dr. Shannon Varley, following all social distancing protocols.

### **II. TITLE I NON-PUBLIC SCHOOL AGREEMENT BETWEEN KEYSTONE OAKS SCHOOL DISTRICT AND ALLEGHENY INTERMEDIATE UNIT**

It is recommended that the Board approve the agreement between Keystone Oaks School District and the Allegheny Intermediate Unit in the amount of \$31,726.00 for Non-Public Title I Instructional services for the Diocese of Pittsburgh.

**For Information Only**

These funds are the required non-public shares of the district's allocation.

### **III. TITLE IIA NON-PUBLIC SCHOOL AGREEMENT BETWEEN KEYSTONE OAKS SCHOOL DISTRICT AND ALLEGHENY INTERMEDIATE UNIT**

It is recommended that the Board approve the agreement between Keystone Oaks School District and the Allegheny Intermediate Unit in the amount of \$3,240.00 for Title IIA Non-Public School Professional Development Services for the Diocese of Pittsburgh.

**For Information Only**

These funds are the required non-public shares of the district's allocation.

**IV. AGREEMENT BETWEEN KEYSTONE OAKS SCHOOL DISTRICT AND WATERFRONT LEARNING SERVICES**

It is recommended that the Board approve the agreement Keystone Oaks School District and Allegheny Intermediate Unit d/b/a Waterfront Learning Services to provide certain flexible virtual education program opportunities for students enrolled in the district through June 30, 2021.

**V. DISTRICT ELEMENTARY CYBER PROGRAM**

The Administration recommends that the Board approve the agreement with Waterfront Learning to utilize Pearson as the District's Elementary Cyber program for the 2020/2021 school year at a cost not to exceed \$485.00 per student.

**VI. DISTRICT SECONDARY CYBER PROGRAM**

The Administration recommends that the Board approve the agreement with Waterfront Learning to utilize Edgenuity as the District's Secondary Cyber program for the 2020/2021 school year at a cost not to exceed \$20,700.00.

# **PUPIL PERSONNEL REPORT**

**August 18, 2020**

**Dr. William Stropkaj**

## **BOARD ACTION REQUESTED**

### **I. THE BRADLEY CENTER**

The Administration recommends that the Board approve the Agreement for Education Services between The Bradley Center and the Keystone Oaks School District for the 2020/2021 school year.

For Information Only

Tuition for the 2020/2021 school year is \$168.33 per day per enrolled child.

### **II. THE WATSTON INSTITUTE SOCIAL CENTER FOR ACADEMIC ACHIEVEMENT (WISCA)**

The Administration recommends that the Board approve the Agreement between Watson Institute Social Center for Academic Achievement (WISCA) and the Keystone Oaks School District for the 2020/2021 school year.

For Information Only

Tuition for the 2020/2021 school year is billed quarterly. Annual tuition cost is \$48,346.00 per student.

# PERSONNEL REPORT

August 18, 2020

Mr. Matthew Cesario, Chairperson  
Ms. Patricia A. Shaw, Co-Chairperson

## BOARD ACTION REQUESTED

### I. RESIGNATION

It is recommended that the Board accept the following resignations:

<u>Name</u>	<u>Position</u>	<u>Effective Date</u>
Mykkia Daufen	Special Education Teacher	August 17, 2020
Dena DeChellis	Special Education Teacher	August 7, 2020
Rebecca Hast	Special Education Teacher	August 15, 2020
Shelby Keebler	Paraprofessional Nurses' Assistant	August 12, 2020

### II. APPOINTMENTS

#### 1. Secretary – High School

In compliance with the *Keystone Oaks Educational Support Personnel Association Agreement 2018-2022*, the Administration recommends the retro-active employment of:

**Sabrina Amman**  
Secretary – High School  
Salary - \$34,721.85 (pro-rated)  
Effective – August 17, 2020

#### 2. Professional Employee

In compliance with the *Keystone Oaks Education Association Collective Bargaining Agreement 2017-2020*, the Administration recommends the employment of:

**Pam Gianoglio**  
Special Education – High School  
Salary - \$45,000.00 (M, Step 1)  
Effective – August 24, 2020

#### 3. Curriculum Leaders 2020/2021

In compliance with the *Keystone Oaks Education Association Collective Bargaining Agreement 2017-2020*, it is recommended that the following teachers be approved as Curriculum Leaders for the 2020/2021 school year:

<u>Employee</u>	<u>Grade/Subject</u>	<u>Compensation</u>
Mary Poe	Kindergarten	\$3,000.00
Kellie Dawson	First Grade	\$3,000.00
Shannan Turner	Second Grade	\$3,000.00
Jamie Barbin	Third Grade	\$3,000.00
Kristie Rosgone	Fourth Grade	\$3,000.00
Jen Harke	Fifth Grade	\$3,000.00
Lisa McMahan	English Language Arts 6-8	\$3,000.00
Jennifer Bogdanski	English Language Arts 9-12	\$3,000.00
Pat Falsetti	Math 6-8	\$3,000.00
Joshua Kirchner	Math 9-12	\$3,000.00
Tricia Kreitzer	Science 6-12	\$3,000.00
William Eibeck	Music	\$3,000.00

#### **4. Department Liaisons 2020/2021**

In compliance with the *Keystone Oaks Education Association Collective Bargaining Agreement 2017-2020*, it is recommended that the following teachers be approved as Department Liaisons for the 2020/2021 school year:

<u>Employee</u>	<u>Grade/Subject</u>	<u>Compensation</u>
Jennifer Tom	Advanced Placement Coordinator	\$1,000.00
Lisa McMahan	Sixth Grade	\$1,000.00
Mark Kopper	Eighth Grade	\$1,000.00
Lisa Forlini	High School World Languages	\$1,000.00
John Murphy	High School Social Studies	\$1,000.00
Nicole Kochanski	Special Education K – 5	\$1,000.00
Melissa Palmieri	Special Education 6 – 8	\$1,000.00
Michael Orsi	Special Education 9 – 12	\$1,000.00

#### **5. Project Succeed Instructors 2020/2021**

It is recommended that the Board approve the following individuals as Project Succeed instructors for the 2020/2021 school year:

Joel Vanucci	Director
Linda Capozzoli	Career Awareness Assistant
Colleen Heaney Mertz	Science
Lynn Heasley	Career Awareness
Rick Heilmann	English
Elizabeth Venturella	Mathematics
John Murphy	Social Studies
Mike Orsi	Special Education (Learning Support)
Beth Smith	Computer Education

### **III. TENURE**

It is recommended that the Board recognize the following individuals as having completed the requirements according to the Commonwealth of Pennsylvania and achieving tenure on August 22, 2020 with a Professional Contract:

<b>Carly Devine</b>	Myrtle Avenue Elementary
<b>Thomas Duxbury</b>	Dormont Elementary
<b>Kaitlin Hensel</b>	Aiken Elementary
<b>Elizabeth Venturella</b>	Keystone Oaks School Middle School

### **IV. LEAVE OF ABSENCE**

It is recommended that the Board approve the following individuals for Family and Medical Leave:

Employee 3494 – Effective September 1, 2020 to November 25, 2020

Employee 4006 – Effective September 2, 2020 to December 1, 2020

Employee 4615 – Effective August 31, 2020 to November 2, 2020

Employee 4622 – Effective August 31, 2020 to November 2, 2020

# FINANCE REPORT

August 18, 2020

Ms. Raeann Lindsey, Chairperson

## BOARD ACTION REQUESTED

### I. ACCOUNTS PAYABLE APPROVAL LISTS THROUGH JUNE 30, 2020

The Administration recommends approval of the following Accounts Payable lists as presented in the *Finance Package*:

A. General Fund as of June 30, 2020 (Check No. 62248-62399)	\$508,216.28
B. Food Service Fund as of June 30, 2020 (Check No. 9255-9260)	\$7,593.65
C. Athletics as of June 30, 2020 (Check No. 3211-3215)	\$5,413.03
D. Capital Reserve as of June 30, 2020 (Check No. 1595-1603)	\$0.00
<b>TOTAL</b>	<b>\$521,222.96</b>

### II. ACCOUNTS PAYABLE APPROVAL LISTS THROUGH JULY 31, 2020

The Administration recommends approval of the following Accounts Payable lists as presented in the *Finance Package*:

A. General Fund as of July 31, 2020 (Check No. 62400-62543)	\$1,100,103.69
B. Food Service Fund as of July 31, 2020 (Check No. 9261-9264)	\$11,091.17
C. Athletics as of July 31, 2020 (Check No. 3216-3220)	\$4,296.05
D. Capital Reserve as of July 31, 2020 (None)	\$0.00
<b>TOTAL</b>	<b>\$1,115,490.91</b>



**FOR INFORMATION ONLY**

**I. EXPENDITURE/REVENUE 2019 – 2020 BUDGET to ACTUAL / PROJECTION**

<b>ACCT</b>	<b>DESCRIPTION</b>	<b>2019-2020 BUDGET TOTAL</b>	<b>2019-2020 12 MONTH JUNE/ACTUAL</b>	<b>MONTH END + ESTIMATE PROJECTION</b>	<b>OVER (UNDER) BUDGET</b>
<b>Revenue</b>					
6000	Local Revenue Sources	\$ 30,223,490	\$ 30,326,281	\$ 30,239,397	\$ 15,907
7000	State Revenue Sources	\$ 12,272,835	\$ 9,773,444	\$ 12,369,457	\$ 96,622
8000	Federal Revenue Sources	\$ 666,330	\$ 576,847	\$ 697,770	\$ 31,440
<b>Total Revenue</b>		<b>\$ 43,162,655</b>	<b>\$ 40,676,572</b>	<b>\$ 43,306,624</b>	<b>\$ 143,969</b>
					<b>(OVER) UNDER BUDGET</b>
<b>Expenditures</b>					
100	Salaries	\$ 17,552,090	\$ 14,879,230	\$ 17,431,240	\$ 120,850
200	Benefits	\$ 11,027,539	\$ 9,180,556	\$ 10,859,370	\$ 168,169
300	Professional/Technical Services	\$ 1,558,997	\$ 1,686,214	\$ 1,686,612	\$ (127,615)
400	Property Services	\$ 1,122,100	\$ 1,007,651	\$ 1,090,501	\$ 31,599
500	Other Services	\$ 5,399,722	\$ 4,967,736	\$ 5,290,993	\$ 108,729
600	Supplies/Books	\$ 1,444,142	\$ 1,383,160	\$ 1,403,160	\$ 40,982
700	Equipment/Property	\$ 635,152	\$ 634,544	\$ 635,152	\$ -
800	Other Objects	\$ 566,455	\$ 535,518	\$ 541,471	\$ 24,984
900	Other Financial Uses	\$ 4,645,250	\$ 4,645,250	\$ 4,645,250	\$ -
<b>Total Expenditures</b>		<b>\$ 43,951,447</b>	<b>\$ 38,919,859</b>	<b>\$ 43,583,749</b>	<b>\$ 367,698</b>
<b>Revenues exceeding Expenditures</b>		<b>\$ (788,792)</b>	<b>\$ 1,756,713</b>		<b>\$ 511,667</b>
<b>Other Financing Sources/(Uses)</b>					
	Interfund Transfers In (Out)	\$ -	\$ -	\$ -	\$ -

**II. SUMMARY OF STUDENT ACTIVITIES ACCOUNTS AS OF JULY 31, 2020**

<b>Bank Account - Status</b>	<b>Middle / High School</b>	<b>Athletics</b>
Cash Balance - 7/1/2020	\$ 74,370.07	\$ 2,446.79
Deposits	\$ 15.79	\$ 0.41
Subtotal	\$ 74,385.86	\$ 2,447.20
Expenditures	\$ -	\$ 895.40
Cash Balance - 7/31/2020	\$ 74,385.86	\$ 1,551.80

**III. BANK BALANCES**

**BANK BALANCES PER STATEMENT AS OF JULY 31, 2020**

	<b>BALANCE</b>
<b>GENERAL FUND</b>	
FNB BANK	\$ 2,061,829
PAYROLL (pass-thru account)	\$ 14,526
FNB SWEEP ACCOUNT	\$ 321,484
ATHLETIC ACCOUNT	\$ 1,552
PLGIT	\$ 2,977,896
FNB MONEY MARKET	\$ 251,688
PSDLAF	\$ 162,284
INVEST PROGRAM	\$ 181,516
OTHER POST-EMPLOYMENT BENEFITS	\$ 1,981,417
COMPENSATED ABSENCES	\$ 429,473
	<b>\$ 8,383,665</b>
<b>CAFETERIA FUND</b>	
FNB BANK	\$ 261,579
PLGIT	\$ 292,264
	<b>\$ 553,843</b>
<b>CONSTRUCTION FUND / CAP RESERVE</b>	
FNB BANK	\$ 1,287,419
PLGIT - G.O. BOND SERIES C OF 2014/ 12-19	\$ 800
	<b>\$ 1,288,219</b>
<b>GRAND TOTAL</b>	<b>\$ 10,225,727</b>

**ACTIVITIES & ATHLETICS REPORT**  
**August 18, 2020**

**Ms. Raeann Lindsey, Chairperson**

**BOARD ACTION REQUESTED**

**I. WINTER/SPRING ATHLETIC BIDS – 2020/2021 SCHOOL YEAR**

It is recommended that the Board approve the Winter/Spring Athletic Bids for the 2020/2021 school year in the amount of \$29,992.25 to the following companies:

Century Sports	\$27,452.25
MF Athletic Co. Inc.	\$ 71.00
The Fitness Doctor	\$ 2,469.00
 Grand Total	 \$29,992.25

KEYSTONE OAKS SCHOOL DISTRICT

# Policy Guide



Policy No. 255

Section PUPILS

Title EDUCATIONAL STABILITY FOR CHILDREN IN FOSTER CARE

Adopted \_\_\_\_\_

Last Revised \_\_\_\_\_

	<b>POLICY NO. 255 EDUCATIONAL STABILITY FOR CHILDREN IN FOSTER CARE</b>	
<b>Section 1</b>	<b><u>Authority</u></b>  To ensure the educational stability of children in foster care, the Board requires the District to collaborate with the local children and youth agency and other school districts.	20 U.S.C. 6311, 6312 42 U.S.C. 675
<b>Section 2</b>	<b><u>Definitions</u></b>  <b>Additional costs</b> means the difference between what the District spends to transport a resident student to their assigned school and the cost to transport a child in foster care to their school of origin.  <b>Foster care</b> means twenty-four (24) hour substitute care for children placed away from their parents or guardians and for whom the child welfare agency has placement and care responsibility. This includes, but is not limited to, placements in foster family homes, foster homes of relatives, group homes, emergency shelters, residential facilities, child care institutions, and pre-adoptive homes. A child is in foster care in accordance with this definition regardless of whether the foster care facility is licensed and payments are made by the state, tribal or local agency for the care of the child, whether adoption subsidy payments are being made prior to the finalization of an adoption, or whether there is federal matching of any payments that are made.	45 CFR 1355.20

**POLICY NO. 255  
EDUCATIONAL STABILITY FOR CHILDREN IN  
FOSTER CARE**

**School of origin** is the school in which a child is enrolled at the time of placement in foster care. If a child’s foster care placement changes, the school of origin would then be considered the school in which the child is enrolled at the time of the placement change.

**Section 3**

**Delegation of Responsibility**

The Board designates the Director of Pupil Services to serve as the District's point of contact for children in foster care.

The District's point of contact shall coordinate with:

20 U.S.C. 6311

1. Local children and youth agency to:
  - a. Establish formal mechanisms to ensure that the district is promptly notified when a child enters foster care or changes foster care placements.
  - b. Develop a protocol on how to make best interest determinations; and
  - c. Develop and coordinate transportation procedures.
2. Other school districts on issues of transfer of records, transportation and other inter-district activities.

**Section 4**

**Guidelines**

**Enrollment/Placement**

A child in foster care shall continue to be enrolled in their school of origin unless there is a determination that it is not in their best interest to attend the school of origin.

20 U.S.C. 6311

*Best Interest Determination -*

The best interest determination shall be made in accordance with federal and state laws and regulations, court orders, and established local procedures.

20 U.S.C. 6311

<p><b>POLICY NO. 255</b></p> <p><b>EDUCATIONAL STABILITY FOR CHILDREN IN FOSTER CARE</b></p>	
<p>In determining whether it is in a child’s best interest to remain in their school of origin, all factors relating to a child’s best interest shall be considered, including the appropriateness of the current educational setting and proximity of foster care placement.</p> <p>Documentation related to the best interest determination shall be kept in the student’s education record.</p> <p><i>Enrollment -</i></p> <p>When a child in foster care is placed in the District and seeks enrollment in district schools, the District’s point of contact shall:</p> <ol style="list-style-type: none"> <li>1. Ensure the child is immediately enrolled and attending school, even if the records normally required for enrollment pursuant to district policies are not available.</li> <li>2. Immediately contact the school last attended by the child to obtain relevant academic and other records.</li> </ol> <p><i>Dispute Resolution -</i></p> <p>If a dispute arises over the appropriate school placement for a child in foster care, to the extent feasible and appropriate, the child shall remain in their school of origin, pending resolution of the dispute.</p> <p><i>Assignment -</i></p> <p>If the District is unable to determine the student's grade level due to missing or incomplete records, the District shall administer tests or utilize appropriate means to determine the student's assignment within the school.</p> <p><i>Student Who Has Exited Foster Care -</i></p> <p>A student who exited foster care may be permitted to finish the school year in this District, if appropriate, without payment of tuition. However, the District shall not be responsible for the transportation to or from school of any student residing outside the school district boundaries.</p>	<p>20 U.S.C. 6311</p>           <p>20 U.S.C. 6311 Pol. 200</p>           <p>Pol. 206</p>           <p>Pol. 202</p>

**POLICY NO. 255  
EDUCATIONAL STABILITY FOR CHILDREN IN  
FOSTER CARE**

Education Records

The District may disclose personally identifiable information from the education records of a student without written consent of the parent(s) or the eligible student if the disclosure is:

1. To comply with a court order authorizing the disclosure of education records in a case where a parent is a party to a proceeding involving child abuse or neglect or a dependency matter.
2. To an agency caseworker or other representative of a state or local child welfare agency, or tribal organization, who has the right to access a student's case plan, as defined and determined by the state or tribal organization, when such agency or organization is legally responsible, in accordance with state or tribal law, for the care and protection of the student, provided that the education records, or the personally identifiable information contained in such records, of the student will not be disclosed by such agency or organization, except to an individual or entity engaged in addressing the student's education needs and authorized by such agency or organization to receive such disclosure and such disclosure is consistent with the state or tribal laws applicable to protecting the confidentiality of a student's education records.

20 U.S.C. 1232g  
Pol. 113.4, 216

Transportation

The District shall ensure that children in foster care needing transportation to their school of origin will promptly receive transportation in a cost-effective manner.

20 U.S.C. 6312  
Pol. 810

To ensure that transportation for children in foster care is provided, arranged, and funded, the District shall collaborate with the local children and youth agency to develop a local transportation plan.

20 U.S.C. 6312

**POLICY NO. 255  
EDUCATIONAL STABILITY FOR CHILDREN IN  
FOSTER CARE**

The transportation plan shall address the following:

20 U.S.C. 6312

1. The procedure the District and local children and youth agency will follow to:
  - a. Promptly provide transportation for children in foster care;
  - b. Promptly arrange transportation for children in foster care; and
  - c. Ensure transportation is funded in a cost-effective manner and in accordance with Section 475(4)(A) of the Social Security Act.

2. How transportation costs will be covered if additional costs are incurred. Options include:

20 U.S.C. 6312

- a. The local children and youth agency agrees to reimburse the District;
- b. The District agrees to pay for the cost;
- c. The District and the local children and youth agency agree to share the costs; or
- d. The District of origin, the District of current residence, and the placing children and youth agency agree to share the costs.

3. Dispute resolution procedures to ensure that any disagreements regarding the cost of transportation are resolved promptly and fairly, and do not impact a student's ability to remain in the school of origin during the dispute resolution process.

34 CFR 299.13

The District shall submit the local transportation plan, including any updates or revisions, to the Pennsylvania Department of Education.



**POLICY NO. 255  
EDUCATIONAL STABILITY FOR CHILDREN IN  
FOSTER CARE**

Transportation shall be provided to children in foster care in accordance with the local transportation plan regardless of whether transportation is provided to District students.

20 U.S.C. 6311,  
6312

Training

The District's point of contact for children in foster care shall provide professional development and training to school staff on the Title I foster care provisions and education needs of children in foster care, as needed.

References:

Every Student Succeeds Act – 20 U.S.C. Sec. 6311, 6312

Family Educational and Privacy Rights Act– 20 U.S.C. Sec. 1232g

Title 34, Education – 34 CFR Sec. 299.13

Title 42, Public Health and Welfare – 42 U.S.C. Sec. 675

Social Security Act – 45 CFR Sec. 1355.20

Board Policy – Pol. 113.4, 200, 202, 206, 216, 810

KEYSTONE OAKS SCHOOL DISTRICT

# Policy Guide



Policy No. 627

Section FINANCES

Title FEDERAL FISCAL COMPLIANCE

Adopted NOVEMBER 22, 2016

Last Revised \_\_\_\_\_

<b>POLICY NO. 627 FEDERAL FISCAL COMPLIANCE</b>		
<b>Section 1</b>	<p><b><u>Authority</u></b></p> <p>The Board shall ensure federal funds received by the District are administered in accordance with federal requirements, including but not limited to the federal Uniform Grant Guidance.</p> <p>The Board shall review and approve all applications for federal funds submitted by the District.</p>	2 CFR Part 200
<b>Section 2</b>	<p><b><u>Delegation of Responsibility</u></b></p> <p>The Board designates the Superintendent or his/her designee and the Federal Programs Coordinator as the District contact for all federal programs and funding.</p> <p>The Superintendent or designee, in collaboration with the Federal Programs Coordinator and <b>Director of Finance and Human Resources</b><del>Business Manager</del>, shall establish and maintain a sound financial management system to include internal controls and federal grant management standards covering the receipt of both direct and state-administered federal grants and to track costs and expenditures of funds associated with grant awards.</p> <p>The Superintendent, to assist in the proper administration of federal funds and implementation of this policy, may approve additional procedures as attachments to this policy.</p>	2 CFR Part 200

**POLICY NO. 627  
FEDERAL FISCAL COMPLIANCE**

**Section 3**

**Guidelines**

The District's financial management system shall be designed with strong internal controls, a high level of transparency and accountability, and documented procedures to ensure that all financial management system requirements are met.

Financial management standards and procedures shall assure that the following responsibilities are fulfilled:

1. Identification – the District must identify, in its accounts, all federal awards received and expended, and the federal programs under which they were received.
2. Financial Reporting – Accurate, current, and complete disclosure of the financial results of each federal award or program must be made in accordance with the financial reporting requirements of the Education Department General Administrative Regulations (EDGAR).
3. Accounting Records – the District must maintain records which adequately identify the source and application of funds provided for federally-assisted activities.
4. Internal Controls – Effective control and accountability, including segregation of duties, must be maintained for all funds, real and personal property and other assets. The District must adequately safeguard all such property and must assure that it is used solely for authorized purposes.
5. Budget Control – Actual expenditures or outlays must be compared with budgeted amounts for each federal award. Procedures shall be developed to establish determination for allowability of costs for federal funds.
6. Cash Management – The District shall maintain written procedures to implement the cash management requirements found in EDGAR.

<b>POLICY NO. 627 FEDERAL FISCAL COMPLIANCE</b>		
<p>7. Allowability of Costs – The District shall ensure that allowability of all costs charged to each federal award is accurately determined and documented.</p>		
<p><u>Standards of Conduct</u></p>		
<p>The District shall maintain standards of conduct covering conflicts of interest and the actions of employees and school officials engaged in the selection, award and administration of contracts.</p>		Pol. 623, 828
<p>All employees shall be informed of conduct that is required for federal fiscal compliance and the disciplinary actions that may be applied for violation of Board policies, administrative regulations, rules and procedures.</p>		Pol. 817
<p><u>Employees – Time and Effort Reporting</u></p>		
<p>All District employees paid with federal funds shall document the time they expend in work performed in support of each federal program, in accordance with law. Time and effort reporting requirements do not apply to contracted individuals.</p>		2 CFR 200.430
<p>District employees shall be reimbursed for travel costs incurred in the course of performing services related to official business as a federal grant recipient.</p>		Pol. 627.1, 827
<p>The District shall establish and maintain employee policies and procedures on hiring, benefits and leave and outside activities, as approved by the Board. District procedures on payment of staff shall apply to employees paid with federal funds and shall include payment in extenuating or emergency conditions, in accordance with applicable law, regulations or emergency declarations by state or federal authorities.</p>		SC 1153 Pol. 319, <del>336, 337,</del> 419, 436, 519, <del>536,</del> <del>537,</del> 805, 812, 813, 837,- 838, 850
<p><u>Record Keeping</u></p>		
<p>The District shall develop and maintain a Records Management Plan and related Board policy and administrative regulations for the retention, retrieval and disposition of manual and electronic records, including emails.</p>		2 CFR 200.333- 200.337 Pol. 826

**POLICY NO. 627  
FEDERAL FISCAL COMPLIANCE**

The District shall ensure the proper maintenance of federal fiscal records documenting:

1. Amount of federal funds.
2. How funds are used.
3. Total cost of each project.
4. Share of total cost of each project provided from other sources.
5. Other records to facilitate an effective audit.
6. Other records to show compliance with federal program requirements.
7. Significant project experiences and results.

All records must be retrievable and available for programmatic or financial audit.

The District shall provide the federal awarding agency, Inspectors General, the Comptroller General of the United States, and the pass-through entity, or any of their authorized representatives, the right of access to any documents, papers, or other District records which are pertinent to the federal award. The District shall also permit timely and reasonable access to the District's personnel for the purpose of interview and discussion related to such documents.

Records shall be retained for a minimum of five (5) years from the date on which the final Financial Status Report is submitted, or as otherwise specified in the requirements of the federal award, unless a written extension is provided by the awarding agency, cognizant agency for audit, oversight agency for audit or cognizant agency for indirect costs.

If any litigation, claim or audit is started before the expiration of the standard record retention period, the records shall be retained until all litigation, claims or audits have been resolved and final action taken.

Pol. 826  
34 CFR 75.730-  
75.732, 76.730-  
76.731

2 CFR 200.336

2 CFR 200.333

2 CFR 200.333

<b>POLICY NO. 627 FEDERAL FISCAL COMPLIANCE</b>		
<p>As part of the Records Management Plan, the District shall develop and maintain a records retention schedule, which shall delineate the record retention format, retention period and method of disposal.</p>		Pol. 826
<p>The Records Management Plan shall include identification of staff authorized to access records, appropriate training, and preservation measures to protect the integrity of records and data.</p>		Pol. 826
<p>The District shall ensure that all personally identifiable data protected by law or regulations is handled in accordance with the requirements of applicable law, regulations, Board policy and administrative regulations.</p>		Pol 113.4, 216, 324
<p><u>Subrecipient Monitoring</u></p>		
<p>In the event that the District awards subgrants, the District shall establish procedures to:</p> <ol style="list-style-type: none"> <li>1. Assess the risk of noncompliance.</li> <li>2. Monitor grant subrecipients to ensure compliance with federal, state, and local laws and Board policy and procedures.</li> <li>3. Ensure the District’s record retention schedule addresses document retention on assessment and monitoring.</li> </ol>		2 CFR 200.330-200.331
<p><u>Compliance Violations</u></p>		
<p>Employees and contractors involved in federally funded programs and subrecipients shall be made aware that failure to comply with federal law, regulations or terms and conditions of a federal award may result in the federal awarding agency or pass-through entity imposing additional conditions or terminating the award in whole or in part.</p>		Pol. 826  2 CFR 200.338, 200.339

**POLICY NO. 627  
FEDERAL FISCAL COMPLIANCE**

References:

[School Code – 24 P.S. Sec. 1153](#)

Board Policy – 113.4, 216, ~~317~~, 319, 324, ~~336, 337, 417~~, 419, ~~436, 517~~, 519, ~~536, 537~~, 623, 627.1, 812, ~~805, 813, 817~~, 826, 827, 828, ~~837~~, 850

Uniform Administrative Requirements, Cost Principals, and Audit Requirements for Federal Awards – 2 CFR Part 200

Post Federal Award Requirements – 2 CFR 200.330-200.331, 200.333-200.337, 200.338, 200.339, 200.430

What Are the Administrative Responsibilities of a Grantee? – 34 CFR 75.730-75.732

What Are the Administrative Responsibilities of the State and Its Subgrantees? – 34 CFR 76.730-76.731

Type of Costs, Obligations and Property Management

**627-AR-1 – Administration of Federal Funds**  
**Type of Costs, Obligations and Property Management**

The District establishes and maintains Board policies, administrative regulations and procedures on administration of federal funds in federal programs as required by the Uniform Grant Guidance and other federal, state and local laws, regulations and requirements. The district's financial management system includes internal controls and grant management standards in the following areas.

Direct and Indirect Costs

**Direct costs** – costs that can be identified specifically with a particular final cost objective, such as a federal award, or other internally or externally funded activity, or that can be directly assigned to such activities relatively easily with a high degree of accuracy.

**Indirect costs** – costs incurred for a common or joint purpose benefiting more than one (1) cost objective, and not readily assignable to the cost objectives specifically benefitted, without effort disproportionate to the results achieved.

Costs incurred for the same purpose in like circumstances must be treated consistently as either direct or indirect costs. (2 CFR Sec. 200.405, 200.413)

Identification with the federal award rather than the nature of the goods and services involved is the determining factor in distinguishing direct from indirect costs.

Direct and indirect costs shall be determined in accordance with law, regulations, the terms and conditions of the federal award, and the district's negotiated indirect cost rate.

The District shall develop an indirect cost rate proposal and cost allocation plan in accordance with law, regulations and the terms and conditions of the federal award.

Timely Obligation of Funds

**Obligations** – orders placed for property and services, contracts and subawards made, and similar transactions during a given period that require payment by the District during the same or a future period.



Type of Costs, Obligations and Property Management

The following table illustrates when funds must be obligated under federal regulations:

<b>Obligation is for:</b>	<b>Obligation is made:</b>
Acquisition of property	On the date on which the District makes a binding written commitment to acquire the property
Personal services by a district employee	When the services are performed
Personal services by a contractor who is not a district employee	On the date on which the District makes a binding written commitment to obtain the services
Public utility services	When the District receives the services
Travel	When the travel occurs
Rental of property	When the District uses the property
A pre-agreement cost that was properly approved by the Secretary under the cost principles in 2 CFR Part 200, Subpart E - Cost Principles	On the first day of the project period

34 CFR §75.707; 34 CFR §76.707

All obligations must occur between the beginning and ending dates of the federal award project, which is known as the period of performance. The period of performance is dictated by law and regulations and will be indicated in the federal award. Specific requirements for carryover funds may be specified in the federal award and must be adhered to by the District. (2 CFR Sec. 200.77, 200.309)

The District will handle obligations and carry over of state-administered and direct grants in accordance with state and federal law and regulations, and the terms and conditions of the federal award. Carryover will be calculated and documented Director of ~~Fiscal Services~~ Finance and Human Resources and shared with the Federal Programs Coordinator and Superintendent or his/her designee.

The District may exercise an extension of the period of performance under a direct grant in accordance with law, regulations and the terms and conditions of the federal award when written notice is provided to the federal awarding agency at least ten (10) calendar days prior to the end of the period of performance. (2 CFR Sec. 200.308(d)(2))

Type of Costs, Obligations and Property Management

The Superintendent or his/her designee in collaboration with the Federal Programs Coordinator and Director of ~~Fiscal Services~~ Finance and Human Resources will decide when an extension of the period of performance is necessary and will recommend that the Board and/or Superintendent approve this process.

The Director of Finance and Human Resources ~~Fiscal Service~~ will develop the required written notice, including the reasons for the extension and revised period of performance; the notice will be issued no later than ten (10) calendar days prior to the end of the currently documented period of performance in the federal award.

The District must seek approval from the federal awarding agency for an extension of the period of performance when the extension is not contrary to federal law or regulations, and the following conditions apply:

1. The terms and conditions of the federal award prohibit the extension;
2. The extension requires additional federal funds; or
3. The extension involves any change in the approved objectives or scope of the project. (2 CFR Sec. §200.308)

The Superintendent or his/her designee, Federal Programs Coordinator, or the Director of ~~Fiscal Services~~ Finance and Human Resources will determine when an extension must be requested for approval by the federal awarding agency, draft the written request and notify the Superintendent and/or Board of the requested extension.

Management of Property Acquired With Federal Funds

*Contract and Purchasing Administration -*

The District maintains internal controls, administrative regulations and procedures to ensure that contractors deliver goods and services in accordance with the terms, conditions and specifications of the designated contract, purchase order or requisition.

*Property Classifications -*

Property shall be classified as **equipment, supplies, computing devices and capital assets** as defined and specified in accordance with law, regulations and Board policy. (Pol. 622)

Type of Costs, Obligations and Property Management

*Inventory Control/Management -*

All property purchased with federal funds, regardless of cost, will be inventoried as a safeguard.

Inventory will be received by the department or program requesting the item; designated staff will inspect the property, compare it to the applicable purchase order or requisition, and ensure it is appropriately logged and tagged in the district's property management system.

Items acquired will be physically labeled by source of funding and acquisition date.

Inventory records of equipment and computing devices must be current and available for review and audit, and include the following information:

1. Description of the item, including any manufacturer's model number.
2. Manufacturer's serial number or other identification number.
3. Identification of funding source.
4. Acquisition date and unit cost.
5. Source of items, such as company name.
6. Percentage of federal funds used in the purchase.
7. Present location, use, condition of item, and date information was reported.
8. Pertinent information on the ultimate transfer, replacement or disposition of the item and sale price of the property.

Inventory will be updated as items are sold, lost or stolen, or cannot be repaired, and new items are purchased.

*Physical Inventory -*

Physical inventory of property will be completed by designated district staff in accordance with applicable federal and state law and regulation and Board policy. (Pol. 622, 706)

The physical inventory of items will be conducted annually, and the results will be reconciled with the inventory records and reported to the federal awarding agency.

Type of Costs, Obligations and Property Management

*Maintenance -*

The District establishes adequate maintenance procedures to ensure that property is maintained in good condition in accordance with law, regulation and Board policy. (Pol. 704, 708, 710)

*Safeguards -*

The District ensures that adequate safeguards are in place to prevent loss, damage or theft of property:

1. Any loss, damage or theft will be reported to the Director of ~~Fiscal Services~~ Finance and Human Resources, and investigated and fully documented, and may be reported to local law enforcement.
2. If stolen items are not recovered, the District will submit copies of the investigative report and insurance claim to the federal awarding agency.
3. The District may be responsible for replacing or repairing lost, damaged, destroyed or stolen items.
4. Replaced equipment is property of the originally funded program and should be inventoried accordingly.
5. District property may only be loaned in accordance with Board policy and administrative regulations. (Pol. 707, 708, 710)

*Disposition of Property Acquired with Federal Funds –*

When the District determines that real property, including land, land improvements structures and accessories thereto, acquired under a federal award is no longer needed for the originally authorized purpose, the District must obtain disposition instructions from the federal awarding agency or pass-through entity administering the program, in accordance with applicable law and regulations. (2 CFR Sec. 200.311)

When the District determines that equipment or supplies acquired under a federal award are no longer needed for the original project or program or for other activities currently or previously supported by a federal awarding agency, the Director of ~~Fiscal Services~~ Finance and Human Resources, in collaboration with the Superintendent and Federal Programs Coordinator, will

Type of Costs, Obligations and Property Management

contact the federal awarding agency or pass-through entity administering the program to obtain disposition instructions, based on the fair market value of the equipment or supplies.

Generally, items with a fair market value of \$5,000 or less that are no longer effective may be retained, sold, purged, or transferred to the District. For items with a fair market value greater than \$5,000, the federal awarding agency is entitled to the federal share of the current market value or sales proceeds.

If the District will be replacing the equipment or supplies, the District may use the existing equipment or supplies as a trade-in or sell the property and use the proceeds to offset the cost of the replacement property.

The Director of ~~Fiscal Services~~ Finance and Human Resources will be responsible for contacting the federal awarding agency and determining the process for disposition of equipment or supplies.

The District may use any of the following methods in disposing of unnecessary equipment or supplies acquired with federal funds:

1. Public auction and/or online sale – generally conducted by a licensed auctioneer.
2. Salvage – scrap sold to local dealers.
3. Negotiated sale – normally used when disposing of items of substantial value.
4. Sealed bid – normally used for items of substantial value or unique qualities.
5. Pre-priced sale – large quantities of obsolete or surplus equipment or supplies may be sold by this method.
6. Donation to charitable organizations, for equipment or supplies with little to no value.
7. Disposition to trash for equipment or supplies with no value.

The Director of ~~Fiscal Services~~ Finance and Human Resources will be responsible for maintaining records of obsolete and surplus property disposed of, and will report to the federal awarding agency when required.

## **627-AR-2 – Allowability of Costs – Federal Programs**

Expenditures must be aligned with approved budgeted items. Any changes or variations from the state-approved budget and grant application need prior approval from the state.

### **Delegation of Responsibility**

When determining how the School District will spend its grant funds, the Director of **Fiscal Services** Finance and Human Resources, in collaboration with the Federal Programs Coordinator, will review the proposed cost to determine whether it is an allowable use of federal grant funds *before* obligating and spending those funds on the proposed good or service.

### **Allowability Determinations**

All costs supported by federal education funds must meet the standards outlined in EDGAR, 2 CFR Part 3474 and 2 CFR Part 200, Subpart E, which are listed below. The Director of **Fiscal Services** Finance and Human Resources must consider these factors when making an allowability determination. A section entitled, *Helpful Questions for Determining Whether Costs are Allowable*, is located at the end of this document.

Part 200 sets forth general cost guidelines that must be considered, as well as rules for specific types of items, both of which must be considered when determining whether a cost is an allowable expenditure of federal funds. The expenditure must also be allowable under the applicable program statute (e.g., Title I of the Elementary and Secondary Education Act (ESEA), or the Carl D. Perkins Career and Technical Education Act (Perkins)), along with accompanying program regulations, non-regulatory guidance and grant award notifications.

Restrictions in state and local rules or policy also must be considered. For example, travel and other job-related expenses incurred by employees are not allowable unless they also are in compliance with Board policy and related administrative regulations.

Whichever allowability requirements are stricter will govern whether a cost is allowable.

General allowability determination factors include the following:

1. **Be Necessary and Reasonable for the performance of the federal award.** 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 to incur the cost was made. For example, **reasonable** means that sound business practices were followed, and purchases were comparable to market prices.

627 Federal Fiscal Compliance – Attachment – 627-AR-2 – Allowability of Costs – Federal Programs

When determining reasonableness of a cost, consideration must be given to:

- Whether the cost is a type generally recognized as ordinary and necessary for the operation of the District or the proper and efficient performance of the federal award.
- The restraints or requirements imposed by factors, such 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 for the geographic area.
- Whether the individual incurring the cost acted with prudence in the circumstances considering responsibilities to the District, its employees, its students, the public at large, and the federal government.
- Whether the District significantly deviates from its established practices and policies regarding the incurrence of costs, which may unjustifiably increase the federal award's cost. (2 CFR Sec. 200.404)

Whether a cost is **necessary** will be determined based on the needs of the program. Specifically, the expenditure must be necessary to achieve an important program objective. A key aspect in determining whether a cost is necessary is whether the district can demonstrate that the cost addresses an existing need, and can prove it. For example, the school entity may deem a language skills software program necessary for a [Language Education Program](#)~~limited English proficiency program~~.

When determining whether a cost is necessary, consideration may be given to:

- Whether the cost is needed for the proper and efficient performance of the federal award program.
  - Whether the cost is identified in the approved budget or application.
  - Whether there is an educational benefit associated with the cost.
  - Whether the cost aligns with identified needs based on results and findings from a needs assessment.
  - Whether the cost addresses program goals and objectives and is based on program data.
2. **Allocable to the federal award.** A cost is allocable to the federal award if the goods or services involved are chargeable or assignable to the federal award in accordance with the relative benefit received. This means that the federal grant program derived a benefit in proportion to the funds charged to the program. (2 CFR Sec. 200.405)

627 Federal Fiscal Compliance – Attachment – 627-AR-2 – Allowability of Costs – Federal Programs

For example, if fifty percent (50%) of a teacher’s salary is paid with grant funds, then that teacher must spend at least fifty percent (50%) of his/her time on the grant program.

3. **Consistent with policies and procedures that apply uniformly to both federally-financed and other activities of the school entity.**
4. **Conform to any limitations or exclusions set forth as cost principles in Part 200 or in the terms and conditions of the federal award.**
5. **Consistent treatment.** A cost cannot be assigned to a federal award as a direct cost if any other cost incurred for the same purpose in like circumstances has been assigned as an indirect cost under another award.
6. **Adequately documented.** All expenditures must be properly documented.
7. **Be calculated in accordance with generally accepted accounting principles (GAAP), unless provided otherwise in Part 200.**
8. **Not included as a match or cost-share, unless the specific federal program authorizes federal costs to be treated as such.** Some federal program statutes require the nonfederal entity to contribute a certain amount of nonfederal resources to be eligible for the federal program.
9. **Be the net of all applicable credits.** The term “applicable credits” refers to those receipts or reduction of expenditures that operate to offset or reduce expense items allocable to the federal award. Typical examples of such transactions are: purchase discounts; rebates or allowances; recoveries or indemnities on losses; and adjustments of overpayments or erroneous charges. To the extent that such credits accruing to or received by the state relate to the federal award, they shall be credited to the federal award, either as a cost reduction or a cash refund, as appropriate. (2 CFR Sec. 200.406)

**Selected Items of Cost**

Subpart E of Part 200 sets forth principles to be applied in establishing the allowability of fifty-five (55) specific cost items (commonly referred to as Selected Items of Cost), at 2 CFR Sec. 200.420-200.475. These specific cost items are listed in the chart below along with the citation to the section of Subpart E addressing the allowability of that item. These principles are in addition to the other general allowability standards, and apply whether or not a particular item of cost is properly treated as direct cost or indirect (F&A) cost. Meeting the specific criteria for a listed item does not by itself mean the cost is allowable, as it may be unallowable under other standards or for other reasons, such as restrictions contained in the terms and conditions of a particular grant or restrictions established by the state or in Board policy. If an item is unallowable for any of these reasons, federal funds cannot be used to purchase it.

School district personnel responsible for spending federal grant funds (Superintendent or his/her designee, Federal Programs Coordinator, and Director of ~~Fiscal Services~~ Finance and Human



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[Resources](#)) and for determining allowability must be familiar with and refer to the Part 200 selected items of cost section. These rules must be followed when charging these specific expenditures to a federal grant. When applicable, employees must check costs against the selected items of cost requirements to ensure the cost is allowable, and also check state, district and program-specific rules.

The selected item of cost addressed in Part 200 includes the following (in alphabetical order):

<b>Item of Cost</b>	<b>Citation of Allowability Rule</b>
Advertising and public relations costs	2 CFR § 200.421
Advisory councils	2 CFR § 200.422
Alcoholic beverages	2 CFR § 200.423
Alumni/ae activities	2 CFR § 200.424
Audit services	2 CFR § 200.425
Bad debts	2 CFR § 200.426
Bonding costs	2 CFR § 200.427
Collection of improper payments	2 CFR § 200.428
Commencement and convocation costs	2 CFR § 200.429
Compensation – personal services	2 CFR § 200.430
Compensation – fringe benefits	2 CFR § 200.431
Conferences	2 CFR § 200.432
Contingency provisions	2 CFR § 200.433
Contributions and donations	2 CFR § 200.434
Defense and prosecution of criminal and civil proceedings, claims, appeals and patent infringements	2 CFR § 200.435
Depreciation	2 CFR § 200.436
Employee health and welfare costs	2 CFR § 200.437
Entertainment costs	2 CFR § 200.438
Equipment and other capital expenditures	2 CFR § 200.439
Exchange rates	2 CFR § 200.440
Fines, penalties, damages and other settlements	2 CFR § 200.441
Fund raising and investment management costs	2 CFR § 200.442
Gains and losses on disposition of depreciable assets	2 CFR § 200.443
General costs of government	2 CFR § 200.444
Goods and services for personal use	2 CFR § 200.445
Idle facilities and idle capacity	2 CFR § 200.446
Insurance and indemnification	2 CFR § 200.447
Intellectual property	2 CFR § 200.448
Interest	2 CFR § 200.449
Lobbying	2 CFR § 200.450

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Losses on other awards or contracts	2 CFR § 200.451
Maintenance and repair costs	2 CFR § 200.452
Materials and supplies costs, including costs of computing devices	2 CFR § 200.453
Memberships, subscriptions, and professional activity costs	2 CFR § 200.454
Organization costs	2 CFR § 200.455
Participant support costs	2 CFR § 200.456
Plant and security costs	2 CFR § 200.457
Pre-award costs	2 CFR § 200.458
Professional services costs	2 CFR § 200.459
Proposal costs	2 CFR § 200.460
Publication and printing costs	2 CFR § 200.461
Rearrangement and reconversion costs	2 CFR § 200.462
Recruiting costs	2 CFR § 200.463
Relocation costs of employees	2 CFR § 200.464
Rental costs of real property and equipment	2 CFR § 200.465
Scholarships and student aid costs	2 CFR § 200.466
Selling and marketing costs	2 CFR § 200.467
Specialized service facilities	2 CFR § 200.468
Student activity costs	2 CFR § 200.469
Taxes (including Value Added Tax)	2 CFR § 200.470
Termination costs	2 CFR § 200.471
Training and education costs	2 CFR § 200.472
Transportation costs	2 CFR § 200.473
Travel costs	2 CFR § 200.474
Trustees	2 CFR § 200.475

~~Likewise, it is possible for the State and/or District to put additional requirements on a specific item of cost. Under such circumstances, the stricter requirements must be met for a cost to be allowable. Accordingly, employees must consult federal, State and District requirements when spending federal funds. For example, often the State's travel rules are more restrictive than federal rules, which mean the State's policies must be followed. Policy No. 827: Travel Related Expense Reimbursement will be followed at all times.~~

~~In order for a cost to be allowable, the expenditure must also be allowable under the applicable program statute (e.g., Title I of the Elementary and Secondary Education Act (ESEA), or the Carl D. Perkins Career and Technical Education Act (Perkins)), along with accompanying program regulations, non-regulatory guidance and grant award notifications.~~

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~~The state and/or District rules related to some specific cost items are discussed below. District employees must be aware of these State and District rules and ensure they are complying with these requirements. The Director of Fiscal Services and the Federal Programs Coordinator will make employees aware of these rules.~~

*Helpful Questions for Determining Whether Costs are Allowable -*

In addition to applying the cost principles and standards described above, district staff involved in expending federal funds should ask the following questions when assessing the allowability of a particular cost:

1. Is the proposed cost allowable under the relevant program?
2. Is the proposed cost consistent with an approved program plan and budget?
3. Is the proposed cost consistent with program specific fiscal rules? For example, the school entity may be required to use federal funds only to supplement the amount of funds available from nonfederal (and possibly other federal) sources, or only as a match for funds from nonfederal sources.
4. Is the proposed cost consistent with EDGAR?
5. Is the proposed cost consistent with specific conditions imposed on the grant (if applicable)?
6. Is the proposed cost consistent with the underlying needs of the program? For example, program funds must benefit the appropriate population of students for which they are allocated. This means that, for instance, funds allocated under Title III of the Elementary and Secondary Education Act (ESEA) governing language instruction programs for **Limited English Learner Proficient (LELP)** students must only be spent on **LELP** students and cannot be used to benefit non-**LELP** students.
7. Will the cost be targeted at addressing specific areas of weakness that are the focus of the program, as indicated by available data?

Funds should be targeted to address areas of weakness, as necessary. To make this determination, the Director of ~~Fiscal Services~~ **Finance and Human Resources** should review data when making purchases to ensure that federal funds to meet these areas of concern.

Any questions related to specific costs should be forwarded to the Director of ~~Fiscal Services~~ **Finance and Human Resources** who shall consult with the school solicitor for clarification as appropriate.

## 627-AR-3 – Cash Management – Federal Programs

~~The District will comply with applicable methods and procedures for payment that minimize the time elapsing between the transfer of funds and disbursement by the District, in accordance with the Cash Management Improvement Act at 31 CFR Part 205.~~ Generally, the District receives payment from the Pennsylvania Department of Education (PDE) on a reimbursement basis. In some circumstances, the District may receive an advance of federal grant funds. This attachment addresses responsibilities of the District and district staff under those alternative payment methods. In either case, the District shall maintain accounting methods and internal controls and procedures that assure those responsibilities are met.

### Payment Methods

#### Reimbursements -

The District will initially charge federal grant expenditures to nonfederal funds.

The Director of ~~Fiscal Services~~ Finance and Human Resources will request reimbursement for actual expenditures incurred under the federal grants quarterly ~~as requested by law~~.

Such requests shall be submitted with appropriate documentation and signed by the requestor.

Requests for reimbursements will be approved by the Director of ~~Fiscal Services~~ Finance and Human Resources.

~~Requests for R~~ reimbursement will be submitted on the appropriate form to the PDE portal. ~~and must contain the signature of the Director of Fiscal Services and the Administrator who is requesting the fund or who is overseeing the program for which the funds are being requested.~~

All reimbursements are based on actual disbursements, not on obligations. PDE will process reimbursement requests within the timeframes required for disbursement.

Consistent with state and federal requirements, the District will maintain source documentation supporting the federal expenditures (invoices, time sheets, payroll stubs, etc.) and will make such documentation available for PDE to review upon request.

Reimbursements of actual expenditures do not involve interest calculations.

**Advances -**

When the District receives advance payments of federal grant funds, it must minimize the time elapsing between the transfer of funds to the District and the expenditure of those funds on allowable costs of the applicable federal program. (2 CFR Sec. 200.305(b)) The District shall attempt to expend all advances of federal funds within seventy-two (72) hours of receipt.

When applicable, the District shall use existing resources available within a program before requesting additional advances. Such resources include program income (including repayments to a revolving fund), rebates, refunds, contract settlements, audit recoveries, and interest earned on such funds. (2 CFR Sec. 305(b)(5))

The District shall hold federal advance payments in insured, interest-bearing accounts, ~~unless an allowable exception applies. The District will begin to calculate interest earned on cash balances once funds are deposited into the District's account.~~

The District is permitted to retain for administrative expense up to \$500 per year of interest earned on federal grant cash balances. Regardless of the federal awarding agency, interest earnings exceeding \$500 per year shall be remitted annually to the Department of Health and Human Services Payment Management System (PMS) through an electronic medium using either Automated Clearing House (ACH) network or a Fedwire Funds Service payment. (2 CFR Sec. 200.305(b)(9))

Pursuant to federal guidelines, interest earnings shall be calculated from the date that the federal funds are drawn down from the G5 system until the date on which those funds are disbursed by the District. Consistent with state guidelines, interest accruing on total federal grant cash balances shall be calculated on cash balances per grant and applying the actual or average interest rate earned.

Remittance of interest shall be responsibility of the Director of ~~Fiscal Services~~ Finance and Human Resources.

## **627-AR-4 – Grant Subrecipient Monitoring Procedures – Federal Programs**

In the event the District disperses federal funds received through a federal award to other entities and assigns responsibilities to the outside entity to conduct a portion of the work, the District shall be responsible for determining, on a case-by-case basis, whether the agreement with such entity places the outside entity in the role of a subrecipient receiving a subaward of federal funding, or the role of a contractor.

If the District grants subawards of federal funding to other entities as subrecipients, the district shall be responsible for:

1. Evaluating the entity for risk of noncompliance to determine appropriate monitoring practices.
2. Monitoring the subrecipient entity's implementation to ensure compliance with federal, state and local laws, conditions of the federal funding award, and Board policy and procedures.
3. Notifying the subrecipient entity of identified deficiencies found during the monitoring process and ensuring that identified deficiencies are corrected.
4. Documenting and retaining records on subrecipient identification, notification, evaluation, monitoring and corrective actions taken.

### Definitions

For purposes of policies and procedures related to federal programs, the following definitions shall apply:

**Contract** – A legal instrument by which a non-federal entity purchases property or services needed to carry out the project or program under a federal award. The term as used here does not include a legal instrument, even if the entity considers it a contract, when the substance of the transaction meets the definition of a federal program award or subaward. (2 CFR 200.22)

**Contractor** – An entity that receives a contract, as defined in law and regulations, by which a non-federal entity purchases property or services needed to carry out the project or program under a federal award. (2 CFR 200.23)

**Pass-through entity** – A non-federal entity that provides a subaward to a subrecipient to carry out part of a federal program. The District serves as the pass-through entity in cases where it awards federal funding to a subrecipient as defined in this procedure. (2 CFR 200.74)

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**Subaward** – An award provided by a pass-through entity to a subrecipient in order to carry out part of a federal award received by the pass-through entity. It does not include payments to a contractor or payments to an individual that is a beneficiary of a federal program. A subaward may be provided through any form of legal agreement, including an agreement that the pass-through entity considers a contract. (2 CFR 200.92)

**Subrecipient** – a non-federal entity that receives a subaward to carry out part of a federal program; but does not include an individual that is a beneficiary of such program. (A subrecipient may also be a recipient of other federal awards directly from a federal awarding agency.) (2 CFR 200.93)

Subrecipient Versus Contractor

The district must determine, on a case-by-case basis, whether an entity receiving funds from the district as part of a federal funding program serves in a role of subrecipient or contractor. (2 CFR 200.330)

The Director of **Fiscal Services Finance and Human Resources**, in collaboration with the Superintendent or his/her designee, and the Federal Programs Coordinator, shall be responsible for analyzing the criteria listed in the chart below and evaluating the relationship with the entity based on the substance of the legal agreement, rather than the form of the agreement. The Director of **Fiscal Services Finance and Human Resources** may consult with the school solicitor or other qualified counsel in making such determination.

<b>Subrecipient</b>	<b>Contractor</b>
Creates a Federal assistance relationship	Purpose is to obtain goods and services for the non-Federal entity’s own use and creates a procurement relationship
Determines who is eligible to receive what Federal assistance	Provides the goods and services within normal business operations
Has its performance measured in relation to whether objectives of a Federal program were met	Provides similar goods or services to many different purchasers
Has responsibility for programmatic decision making	Normally operates in a competitive environment
Is responsible for adherence to applicable Federal program requirements specified in the Federal award; and	Provides goods or services that are ancillary to the operation of the Federal program; and
In accordance with its agreement, uses the Federal funds to carry out a program for a public purpose specified in authorizing statute, as opposed to providing goods or services for the benefit of the pass-through entity (PTE)	Is not subject to compliance requirements of the Federal program as a result of the agreement, though similar requirements may apply for other reasons

\*chart provided by © American Institute of CPAs (AICPA)

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The District shall notify subrecipients that they have been identified as a subrecipient and that the funding qualifies as a subaward. The District shall provide the subrecipient with the following information as specified at 2 CFR Sec. 200.331(a) regarding the federal funding award, and any subsequent changes:

- 1) Federal Award Identification information, including:
  - (i) Subrecipient name (which must match the name associated with its unique entity identifier)
  - (ii) Subrecipient's unique entity identifier
  - (iii) Federal Award Identification Number (FAIN)
  - (iv) Federal Award Date (see §200.39 federal award date) of award to the recipient by the federal agency
  - (v) Subaward Period of Performance Start and End Date
  - (vi) Amount of Federal Funds Obligated by this action by the pass-through entity to the subrecipient
  - (vii) Total Amount of Federal Funds Obligated to the subrecipient by the pass-through entity including the current obligation
  - (viii) Total Amount of the Federal Award committed to the subrecipient by the pass-through entity
  - (ix) Federal award project description, as required to be responsive to the Federal Funding Accountability and Transparency Act (FFATA)
  - (x) Name of federal awarding agency, pass-through entity, and contact information for awarding official of the pass-through entity
  - (xi) CFDA Number and Name; the pass-through entity must identify the dollar amount made available under each federal award and the CFDA number at time of disbursement
  - (xii) Identification of whether the award is R&D
  - (xiii) Indirect cost rate for the federal award (including if the de minimis rate is charged per §200.414 Indirect (F&A) costs)



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- 2) All requirements imposed by the pass-through entity on the subrecipient so that the federal award is used in accordance with federal statutes, regulations and the terms and conditions of the federal award.
- 3) Any additional requirements that the pass-through entity imposes on the subrecipient in order for the pass-through entity to meet its own responsibility to the federal awarding agency including identification of any required financial and performance reports.
- 4) An approved federally recognized indirect cost rate negotiated between the subrecipient and the federal government or, if no such rate exists, either a rate negotiated between the pass-through entity and the subrecipient (in compliance with this part), or a de minimis indirect cost rate as defined in §200.414 Indirect (F&A) costs, paragraph (f).
- 5) A requirement that the subrecipient permit the pass-through entity and auditors to have access to the subrecipient's records and financial statements as necessary for the pass-through entity to meet the requirements of this part.
- 6) Appropriate terms and conditions concerning closeout of the subaward.

Evaluation of Risk

The District shall evaluate each subrecipient's risk of noncompliance with law, regulations and the terms and conditions of the subaward to determine appropriate monitoring practices. (2 CFR 200.331)

The Director of ~~Fiscal Services~~ Finance and Human Resources, in collaboration with the Superintendent or his/her designee shall be responsible for evaluating risk based on the following factors:

1. The subrecipient's prior experience with the same or similar subawards.
2. The results of previous audits, including whether the subrecipient receives a single audit and the extent to which the same or similar subaward has been audited.
3. Whether the subrecipient has new personnel, or new or substantially changed systems and processes.
4. The extent and results of any federal award agency's monitoring of the subrecipient.

The Director of ~~Fiscal Services~~ Finance and Human Resources or designee shall request adequate documentation from the subrecipient to conduct the evaluation of risk; such documentation may include, but shall not be limited to:

1. audit reports

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2. financial reports
3. policies and procedures
4. detailed descriptions or users' guides of current systems and processes

The District shall evaluate subrecipients for risk of noncompliance annually or as specified in the legal agreement contract.

Based on the results of the risk evaluation, the District may consider imposing specific conditions on implementation of the subaward, in accordance with applicable law and regulations. (2 CFR 200.207, 200.331)

### Monitoring

The District shall monitor the implementation and activities of each subrecipient as necessary to ensure that the subaward is used for authorized purposes, in accordance with law, regulations and the terms and conditions of the subaward. The District shall notify subrecipients of monitoring requirements, and may provide technical assistance to subrecipients in complying with monitoring requirements.

As part of the monitoring process, the District shall complete the following steps: (2 CFR 200.331)

1. Review financial and performance reports required by the District.
2. Follow-up and ensure that the subrecipient takes timely and appropriate action on all deficiencies pertaining to the subaward detected during monitoring through audits, on-site reviews and other means.
3. Issue a management decision for audit findings pertaining to the subaward provided to the subrecipient, in accordance with applicable law and regulations. (2 CFR 200.521)

### *Monitoring –*

The District shall be responsible for monitoring of subrecipients.

Monitoring activities may include, but shall not be limited to:

1. Review of progress reports, financial reports and data quality.
2. On-site visits.
3. Review of federal or state debarment lists.

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4. Review of other agreed-upon procedures specified in the legal agreement or contract. (2 CFR 200.425)

The District shall verify that subrecipients are audited as required by applicable law and regulations. (2 CFR 200.331, 2 CFR 200.500-200.521, Pol. 619)

*Follow-Up Actions –*

The Director of ~~Fiscal Services~~ Finance and Human Resources or designee shall provide subrecipients with written documentation detailing their monitoring results and listing any identified deficiencies. The District shall consider whether the results of monitoring indicate the need to revise existing district policy and procedures. (2 CFR 200.331)

The District shall require subrecipients to take immediate action on issues involving ineligible or illegal use of federal funding, and notify the district of corrective action taken.

The District shall require subrecipients to develop a corrective action plan to address other identified deficiencies or noncompliance issues; such plan shall be submitted to the District within 60 days or as specified in the agreed-upon procedures which delineate the process for no more than 60 days, and the District shall evaluate and monitor the activities taken by the subrecipient under the corrective action plan. The District may provide technical assistance and/or training to subrecipients in complying with corrective action requirements.

The Director of ~~Fiscal Services~~ Finance and Human Resources or designee shall maintain all documentation on monitoring of subrecipients and corrective action taken during the monitoring process.

The District shall report issues of noncompliance to the appropriate federal agency where required by law, regulations, or requirements of the federal funding program.

*Remedies for Noncompliance –*

When monitoring activities identify issues of noncompliance that are not addressed through corrective action, the District may take the following actions: (2 CFR 200.331, 200.338)

1. Impose specific conditions on the subrecipient, in accordance with applicable law and regulations. (2 CFR 200.207)
2. Temporarily withhold cash payments, in accordance with applicable law and regulations.
3. Disallow or deny use of funds for all or part of the cost of the activity or action not in compliance.
4. Wholly or partially suspend or terminate the agreement for the federal award.

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5. Recommend that the federal agency initiate suspension and debarment proceedings.
6. Withhold further awards or agreements for the project or program.
7. Take other remedies legally available, in consultation with the school solicitor or other qualified counsel.

Record Retention

The Director of ~~Fiscal Services~~ Finance and Human Resources, in collaboration with the Superintendent or his/her designee and Federal Programs Coordinator, shall ensure that all documentation regarding subrecipient identification, notification, evaluation, monitoring activities and corrective action is maintained in accordance with Board policy and procedures. (Pol. 800)

Records shall be retained in accordance with applicable law, regulations, specific requirements of the federal program and the district's records retention schedule. (2 CFR 200.333-200.337, Pol. 800)

## 627-AR-5 – Procurement – Federal Programs

This document is intended to integrate standard district purchasing procedures with additional requirements applicable to procurements that are subject to the federal Uniform Grant Guidance regulations and/or U.S. Department of Agriculture (USDA) regulations governing school food service programs. The District maintains the following purchasing procedures, in accordance with federal and state laws, regulations and Board policy. (2 CFR 200.318-200.325; 7 CFR 210.16, 210.19, 210.21, 215.14a, 220.16; 24 P.S. 120, 24 P.S. 504, 24 P.S. 508, 24 P.S. 521, 24 P.S. 607, 24 P.S. 609, 24 P.S. 751, 24 P.S. 807.1; 62 Pa. C.S.A. 4601 et seq; Pol. 610, 611, 612, 613, 808)

### Responsibility for Purchasing

The Board has outlined standard district purchasing responsibility, methods of purchasing, price quotations and bid requirements in the following Board policies and their accompanying administrative regulations or procedures:

- Policy 610. Purchases Subject to Bid/Quotation
- Policy 611. Purchases Budgeted
- Policy 612. Purchases Not Budgeted
- Policy 613. Cooperative Purchasing

The following individuals have authority to initiate purchases:

- Superintendent
- Director of **Finance and Human Resources**~~Fiscal Services~~
- Director of Curriculum, Instruction, Assessment and Staff Development
- Director of Technology
- **Director** ~~Supervisor~~ of Special Education
- **Director** ~~Supervisor~~ of Pupil Services
- Director of Buildings, Grounds and Transportation
- Director of Food Services
- Coordinator of Communications and Public Relations
- Principals
- Athletic Director

These individuals have the authority to delegate purchasing authority to responsible individuals whom they supervise, only after consultation with the Superintendent and/or Director of **Finance and Human Resources**~~Fiscal Services~~.

The Business Office is responsible for processing contracts/purchase orders as designated by the Superintendent and the Board of School Directors.

A list of authorized users shall be maintained in the Business Office and shall include the employees in designated positions.

All purchases shall be supervised and monitored on a regular basis by the Director of [Finance and Human Resources](#)~~Fiscal Services~~, who shall ensure the use of funds is in accordance with the funds budgeted for this purpose.

All purchases shall be in compliance with state and local procurement rules and thresholds.

### **Purchase Methods**

When a request for purchase of equipment, supplies or services has been submitted and approved as outlined below, the procurement method to be used will be determined based on the total cost of the purchase as further outlined below. This procedure outlines how the cost thresholds for determining when the quote or formal bidding procedures that are required by state law as reflected in Policy 610 must be modified when making purchases for federally funded purposes to which the Uniform Grant Guidance or USDA regulations apply, so as to comply with both state and federal requirements. At each point where requirements for food service-related procurement under USDA regulations differ, a note will refer to the Food Service Program Notes at the end of this procedure. Final determination of which purchasing procedures are to be applied is delegated to the Director of [Finance and Human Resources](#)~~Fiscal Services~~, under the authority of the Board.

#### **Standard Procurement Documents and Purchase Request Process**

Purchases will be completed using a requisition through the District’s Financial Information System or through the use of a procurement card (see Policy 625 for usage of such card). The requisition will then be converted to a purchase order, which is to be used for payment. In the event a procurement card is used, prior authorization must be given by the Director of [Finance and Human Resources](#)~~Fiscal Services~~.

No purchase requests will be honored unless made on a District-approved requisition form that has the necessary approval or through a procurement card that has prior approval from the Superintendent and the Director of [Finance and Human Resources](#)~~Fiscal Services~~.

The District shall use requisitions or purchase requests in accordance with the applicable purchase method.

The District shall use paper/electronic purchasing records, which are pre-numbered and are accessible to designated purchasing staff in the Business Office and school building offices.

Purchase requests by an employee must be submitted to the building administrator or immediate supervisor. Purchase of all budgeted items or items approved by an administrator or supervisor must be initiated by use of a purchase order or requisition submitted to the Director of [Finance and Human Resources](#)~~Fiscal Services~~.

Purchase orders and requisitions shall contain information including, but not limited to:

1. Description of the services to be performed or goods to be delivered.
2. Location of where services will be performed or goods will be delivered.
3. Appropriate dates of service or delivery.

Documentation on purchase orders and requisitions shall be maintained in accordance with the district's Records Management Policy and records retention schedule. (Pol. 800)

Contracts shall be reviewed by the Superintendent and Solicitor prior to submission to the Board for approval.

Contracts to which the Uniform Grant Guidance apply shall contain the clauses specified in Appendix II to 2 CFR Part 200 (Contract Provisions for Non-Federal Entity Contracts Under Federal Awards), when applicable.

#### Micro-Purchases Not Requiring Quotes or Bidding (up to \$3,500)

For purposes of this procedure, **micro-purchase** means a purchase of equipment, supplies or services for use in federally funded programs using simplified acquisition procedures, the aggregate amount of which does not exceed a base amount of \$3,500. The micro-purchase dollar threshold is adjusted periodically by the federal government, and the threshold most recently established and published in the Federal Register shall apply if other than \$3,500.(48 CFR Subpart 2.1)

**Note: The micro-purchase maximum for federal purposes is lower than the amount below which the School Code and Board policy (Pol. 610) allows purchase for nonfederal purposes to be made without obtaining at least three (3) written or telephonic quotes or using formal competitive bidding.**

The micro-purchase method is used in order to expedite the completion of its lowest dollar small purchase transactions and minimize the associated administrative burden and cost. Procurement by micro-purchase is the acquisition of equipment, supplies or services, the aggregate dollar amount of which does not exceed the micro-purchase threshold.

To the extent practicable, the District distributes micro-purchases equitably among qualified suppliers when the same or materially interchangeable products are identified and such suppliers offer effectively equivalent rates, prices and other terms. The Director of [Finance and Human Resources](#) ~~Fiscal Services~~ will be responsible to determine the equitable distribution of micro-purchases.

Micro-purchases may be awarded without soliciting competitive quotations if the District considers the price to be reasonable. The District will maintain evidence of this reasonableness in the records of all micro-purchases. **Reasonable** means that sound business practices were followed and the purchase is comparable to market prices for the geographic area. Such

determinations of reasonableness may include comparison of the price to previous purchases of the same item or comparison of the price of items similar to the item being purchased. See additional guidelines for reasonableness in 627-AR-2 Allowability of Costs.

Even if the cost of a purchase qualifies it as a micro-purchase, bidding or small purchase procedures may be used optionally when those procedures may result in cost savings.

#### Small Purchase Procedures (between \$3,500 and ~~\$21,000~~<sup>\$19,400</sup>)

For purposes of this procedure, **small purchase procedures** are those relatively simple and informal procurement methods for securing equipment, services, or supplies that cost more than the amount qualifying as a micro-purchase and do not cost ~~\$21,000~~<sup>\$19,400</sup> or more. Small purchase procedures cannot be used for purchases of equipment or supplies or for construction, repair or maintenance services costing ~~\$21,000~~<sup>\$19,400</sup> or more because the School Code requires formal competitive bidding at that level of cost.

The base amount at which bidding is required under state law is adjusted for inflation annually, and the amount most recently established and published in the Pennsylvania Bulletin shall apply if other than ~~\$21,000~~<sup>\$19,400</sup>. (24 P.S. Sec. 120)

Because state law does not require bidding for the purchase of services other than construction, maintenance or repairs on school facilities regardless of total cost, small purchase procedures, including a request for proposal (RFP) procedure, may be used for procurement of such other services except when the estimated total cost will be at or over the federal threshold at which formal competitive bidding is required (\$150,000) or as specified in Board policy (Pol. 610) or state law.

If small purchase procedures are used, written or telephonic price or rate quotations are obtained from at least three (3) qualified sources and records of quotes are maintained as provided in Policy 610. (Pol. 610)

#### Formal Competitive Bidding (~~\$21,000~~<sup>\$19,400</sup> or more)

##### **Publicly Solicited Sealed Competitive Bids:**

For purchases of equipment or supplies, or of services for construction, maintenance or repairs of school facilities, sealed competitive bids are publicly solicited and awarded to the lowest responsive and responsible bidder as provided in Policy 610 when the total cost is estimated to be ~~\$21,000~~<sup>\$19,400</sup> or more. (Pol. 610)

State law does not require bidding for the purchase of services other than construction, maintenance or repairs on school facilities regardless of total cost. For procurement of such other services for federally funded purposes to which the Uniform Grant Guidance applies, formal competitive bidding will be used when the estimated total cost will be at or over the federal threshold of \$150,000 or as specified in Board policy (Pol. 610) or state law.



The federal competitive bidding dollar threshold is adjusted periodically by the federal government, and the threshold most recently established and published in the Federal Register shall apply if other than \$150,000. (48 CFR Subpart 2.1)

Where specified in bidding documents, factors such as discounts, transportation cost, and life cycle costs must be considered in determining which bid is lowest. Payment discounts will only be used to determine the low bid when prior experience indicates that such discounts are usually taken advantage of. Any or all bids may be rejected if there is a sound documented reason.

The sealed bid method is the preferred method for procuring construction, if the following conditions apply:

- A complete, adequate, and realistic specification or purchase description is available.
- Two or more responsible bidders are willing and able to compete effectively for the business.
- The procurement lends itself to a firm fixed price contract and the selection of the successful bidder can be made principally on the basis of price.

If sealed bids are used, the following requirements apply:

- Bids must be solicited from an adequate number of known suppliers, providing them sufficient response time prior to the date set for opening the bids, for state, local, and tribal governments, the invitation for bids must be publically advertised.
- The invitation for bids, which will include any specifications and pertinent attachments, must define the items or services in order for the bidder to properly respond.
- All bids will be opened at the time and place prescribed in the invitation for bids, and for local and tribal governments, the bids must be opened publicly.
- A firm fixed price contract award must be made in writing to the lowest responsive and responsible bidder.
- Any other requirements as specified in Board Policy 610.

### Competitive Proposals

State law does not require public school entities to solicit competitive bids for services other than construction, repairs or maintenance of school facilities, for which competitive bidding is required if the cost will be a base amount as determined by state law. State law allows

competitive proposals relating to work on facilities in lieu of bidding only in the context of guaranteed energy savings contracts.

Federal regulations allow the use of competitive proposals as an alternative when formal bidding would otherwise be required only to procure architectural and engineering services. Other types of services for federally funded purposes to which the Uniform Grant Guidance applies, professional or otherwise, must be procured using competitive bidding when the cost would meet or exceed the federal threshold for competitive bidding (\$150,000).

In the case of services other than for construction, repairs or maintenance of school facilities costing less than that threshold, the District may use small purchase procedures or micro-purchase procedures as applicable based on total cost. A request for proposal (RFP) process can also meet or exceed the small purchase competition requirements under state law and Policy 610 for the acquisition of services other than for construction, repairs or maintenance of school facilities, and can be used if the total cost will be less than \$150,000.

When permitted, the technique of competitive proposals is normally conducted with more than one (1) source submitting an offer, and either a fixed price or cost-reimbursement type contract is awarded. Competitors' qualifications are evaluated and the most qualified competitor is selected, subject to negotiation of fair and reasonable compensation. The District shall comply with other applicable state and federal law and regulations, Board policy and administrative regulations regarding purchasing; the District may consult with the school solicitor or other qualified counsel in determining the required process for purchasing through competitive proposals when necessary.

If this method is used, the following requirements apply:

1. Requests for proposals must be publicized and identify all evaluation factors and their relative importance. Any response to publicized requests for proposals must be considered to the maximum extent practical.
2. Proposals must be solicited from an adequate number of qualified sources.
3. Contracts must be awarded to the responsible firm whose proposal is most advantageous to the program, with price and other factors considered.

Competitive proposals shall be evaluated by the Superintendent, Solicitor and Board based on factors which may include but not limited to:

1. Cost.
2. Experience of contractor.
3. Availability.
4. Personnel qualifications.

5. Financial stability.
6. Minority business, women’s business enterprise, or labor surplus area firm status.
7. Project management expertise.
8. Understanding of district needs.

Evaluations shall be completed in a timely manner, documented and shall be reviewed by the Superintendent.

**Contract/Price Analysis:**

The district performs a cost or price analysis in connection with every procurement action. (2 CFR Sec. 200.323(a)).

A **cost analysis** generally means evaluating the separate cost elements that make up the total price, while a **price analysis** means evaluating the total price, without looking at the individual cost elements.

The method and degree of analysis is dependent on the facts surrounding the particular procurement situation; however, the Director of ~~Finance and Human Resources~~ ~~Fiscal Services~~ must come to an independent estimate prior to receiving bids or proposals. (2 CFR Sec. 200.323(a)). As part of the analysis, the Director of ~~Finance and Human Resources~~ ~~Fiscal Services~~ will enact established business practices which may include evaluation of similar prior procurements and a review process.

When performing a cost analysis, the Director of ~~Finance and Human Resources~~ ~~Fiscal Services~~ negotiates profit as a separate element of the price. To establish a fair and reasonable profit, consideration is given to the complexity of the work to be performed, the risk borne by the contractor, the contractor’s investment, the amount of subcontracting, the quality of its record of past performance, and industry profit rates in the surrounding geographical area for similar work. (2 CFR Sec. 200.323(b)).

Noncompetitive Proposals (Sole Sourcing)

**Procurement by noncompetitive proposals** means procurement through solicitation of a proposal from only one (1) source and may be used only when one or more of the following circumstances apply:

1. The item is available only from a single source.
2. The public exigency or emergency for the requirement will not permit a delay resulting from competitive solicitation. An **emergency** exists whenever the time required for the Board to

act in accordance with regular procedures would endanger life or property or threaten continuance of existing school classes.

3. The federal awarding agency or pass-through entity expressly authorizes noncompetitive proposals in response to a written request from the District.
4. After solicitation of a number of sources, the District determines the competition is inadequate.

At all possible, the District will refrain from using such a method. However, there will be times, as mentioned above, when such method will be necessary. In the event this is the method of procurement, then the Superintendent, along with the Director of [Finance and Human Resources](#) ~~Fiscal Services~~, will require a written statement from the purchaser indicating the circumstances in which the product/service is being purchased under these conditions. This may include written confirmation from the contractor as the sole source of the item. Documentation must be submitted to and maintained by the Business Office.

The District may utilize legal advice from the solicitor regarding noncompetitive proposals.

A cost or price analysis will be performed for all noncompetitive proposals.

### **Purchase Cards**

The district approves the use of procurement cards for permissible purchases by designated employees to improve the efficiency of purchasing activities, reduce processing expenses, improve controls for small-dollar purchases, and streamline contractor payment.

Procurement cards may be used for purchases under federal programs. The use of procurement cards is governed by Board policy 625 Procurement Cards and established administrative regulations. (Pol. 625)

### **Full and Open Competition**

All procurement transactions must be conducted in a manner providing full and open competition consistent with 2 CFR Sec. 200.319. In order to ensure objective contractor performance and eliminate unfair competitive advantage, contractors that develop or draft specifications, requirements, statements of work, or invitations for bids or requests for proposals must be excluded from competing for such procurements. Some of the situations considered to be restrictive of competition include but are not limited to:

1. Placing unreasonable requirements on firms in order for them to qualify to do business.
2. Requiring unnecessary experience and excessive bonding.
3. Noncompetitive pricing practices between firms or between affiliated companies.

4. Noncompetitive contracts to consultants that are on retainer contracts.
5. Organizational conflicts of interest.
6. Specifying only a “brand name” product instead of allowing “an equal” product to be offered and describing the performance or other relevant requirements of the procurement.
7. Any arbitrary action in the procurement process.

EDGAR further requires the following to ensure adequate competition.

### **Minority Businesses, Women’s Business Enterprises, Labor Surplus Area Firms**

The District must take necessary affirmative steps to assure that minority businesses, women’s business enterprises, and labor surplus area firms are used when possible. Affirmative steps must include: (2 CFR Sec. 200.321)

1. Placing qualified small and minority business and women’s business enterprises on solicitation lists.
2. Assuring that small and minority businesses, and women’s business enterprises are solicited whenever they are potential sources.
3. Dividing total purchasing requirements, when economically feasible, into smaller tasks or quantities to permit maximum participation by small and minority business and women’s business enterprises.
4. Establishing delivery schedules, where the requirement permits, which encourage participation by small and minority businesses and women’s business enterprises.
5. Using the services and assistance, as appropriate, of such organizations as the Small Business Administration and the Minority Business Development Agency of the Department of Commerce.
6. Requiring the prime contractor, if subcontracts are let, to take the affirmative steps listed above.

### **Geographical Preferences Prohibited**

The District 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. 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.

### **Prequalified Lists**

The District must ensure that all prequalified lists of persons, firms, or products which are used in acquiring goods and services are current and include enough qualified sources to ensure maximum open and free competition. Also, the District must not preclude potential bidders from qualifying during the solicitation period.

### **Solicitation Language**

The District must ensure that all solicitations incorporate a clear and accurate description of the technical requirements for the material, product, or service to be procured. Such description must not, in competitive procurements, contain features which unduly restrict competition. The description may include a statement of the qualitative nature of the material, product or service to be procured and, when necessary, must set forth those minimum essential characteristics and standards to which it must conform if it is to satisfy its intended use. Detailed product specifications should be avoided if at all possible.

When it is impractical or uneconomical to make a clear and accurate description of the technical requirements, a “brand name or equivalent” description may be used as a means to define the performance or other salient requirements of procurement. The specific features of the named brand which must be met by offers must be clearly stated; and identify all requirements which the offerors must fulfill and all other factors to be used in evaluating bids or proposals.

### **Avoiding Acquisition of Unnecessary or Duplicative Items**

The District must avoid the acquisition of unnecessary or duplicative items. Additionally, consideration must be given to consolidating or breaking out procurements to obtain a more economical purchase; and, where appropriate, an analysis must be made of leases versus purchase alternatives, and any other appropriate analysis to determine the most economical approach.

These considerations are given as part of the process to determine the allowability of each purchase made with federal funds. Such considerations are accessible in the attachment 627-AR-2 Allowability of Costs – Federal Programs.

### **Use of Intergovernmental Agreements and Cooperative Purchasing**

To foster greater economy and efficiency, the District enters into state and local intergovernmental agreements where appropriate for cooperative purchasing or use of common or shared goods and services, as permitted by the Intergovernmental Cooperation Act and the Commonwealth Procurement Code. (Pol. 613; 53 Pa. C.S. Ch. 23; 62 Pa. C.S. Ch. 19)

When procuring supplies or services for federally funded purposes to which the Uniform Grant Guidance applies, the District shall verify that the organization conducting the procurement pursuant to such agreements complies with the applicable requirements and standards of the Uniform Grant Guidance as outlined in this procedure.

### **Use of Federal Excess and Surplus Property**

The District considers the use of federal excess and surplus property in lieu of purchasing new equipment and property whenever such use is feasible and reduces project costs.

### **Debarment and Suspension**

The District 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 District may not subcontract with or award subgrants to any person or company who is debarred or suspended. For all contracts over \$25,000 the District verifies that the contractor with whom the District intends to do business is not excluded or disqualified. (2 CFR Part 200, Appendix II, and 2 CFR Sec. 180.220 and 180.300).

All successful contractors must provide written certification that they have not been suspended or debarred from federal projects. The Director of [Finance and Human Resources](#)~~Fiscal Services~~ will be responsible for verification. Such verification may include accessing the online federal System for Award Management (SAM) to determine whether any relevant party is subject to any suspension or debarment restrictions.

### **Maintenance of Procurement Records**

The District must maintain records sufficient to detail the history of all procurements. These records will include, but are not necessarily limited to the following: rationale for the method of procurement, selection of contract type, contractor selection or rejection, the basis for the contract price (including a cost or price analysis), and verification that the contractor is not suspended or debarred.

Maintenance of records of procurement will be governed by Board policy 800 Records Management and established administrative regulations. (Pol. 800)

### **Time and Materials Contracts**

The District may use a time and materials type contract only: (1) after a determination that no other contract is suitable; and (2) if the contract includes a ceiling price that the contractor exceeds at its own risk. **Time and materials type contract** means a contract whose cost to the District is the sum of: the actual costs of materials, and direct labor hours charged at fixed hourly rates that reflect wages, general and administrative expenses, and profit.

Since this formula generates an open-ended contract price, a time-and-materials contract provides no positive profit incentive to the contractor for cost control or labor efficiency. Therefore, each contract must set a ceiling price that the contractor exceeds at its own risk. Further, the district must assert a high degree of oversight in order to obtain reasonable assurance that the contractor is using efficient methods and effective cost controls.

### **Settlements of Issues Arising Out of Procurements**

The District alone is responsible, in accordance with good administrative practice and sound business judgment, for the settlement of all contractual and administrative issues arising out of procurements. These issues include, but are not limited to, source evaluation, protests, disputes, and claims. These standards do not relieve the District of any contractual responsibilities under its contracts. Violations of law will be referred to the local, state, or federal authority having proper jurisdiction.

### **Protest Procedures to Resolve Dispute**

The District maintains protest procedures to handle and resolve disputes relating to procurements and, in all instances, discloses information regarding the protest to the awarding agency. Protest procedures will be acted on in accordance with current state law and regulations, established district administrative regulations and the advice of the solicitor. (Pol. 610)

### **Food Service Program Notes:**

#### *Exemption from Bidding for Perishable Food Items -*

The School Code exempts purchases of perishable food items from bidding requirements. Bidding for perishable food items is required only if the cost would be at or over the federal threshold at which formal competitive bidding is required (\$150,000). Small purchase procedures may be used for purchases below \$150,000, or micro-purchase procedures for purchases below \$3,500. Use of bidding should be considered as an option if it is feasible and likely to result in cost savings.(24 P.S. Sec. 504(d))

#### *Geographic Preferences -*

The District is permitted to apply a geographic preference when procuring unprocessed locally grown or locally raised agricultural products. When a geographic preference is applied, the district has discretion to determine the local area to which the geographic preference option will be applied.

**Unprocessed locally grown or locally raised agricultural products** means only those agricultural products that retain their inherent character. The effects of the following food handling and preservation techniques shall not be considered as changing an agricultural product into a product of a different kind or character: cooling; refrigerating; freezing; size adjustment



made by peeling, slicing, dicing, cutting, chopping, shucking, and grinding; forming ground products into patties without any additives or fillers; drying/dehydration; washing; packaging (such as placing eggs in cartons), vacuum packing and bagging (such as placing vegetables in bags or combining two (2) or more types of vegetables or fruits in a single package); the addition of ascorbic acid or other preservatives to prevent oxidation of produce; butchering livestock and poultry; cleaning fish; and the pasteurization of milk. (7 CFR Sec. 210.21, 215.14a, 220.16)

*Buy American -*

The District shall purchase, to the maximum extent practicable, domestic commodities or products for food service purposes. The term **domestic commodity or product** means: (7 CFR Sec. 210.21, 220.16)

1. An agricultural commodity that is produced in the United States; and
2. A food product that is processed in the United States substantially using agricultural commodities that are produced in the United States.

*Mandatory Contract Clauses -*

The following provisions shall be included in all cost reimbursable contracts for food services purchases, including contracts with cost reimbursable provisions, and in solicitation documents prepared to obtain offers for such contracts: (7 CFR Sec. 210.21, 215.14a, 220.16)

1. Allowable costs will be paid from the nonprofit school food service account to the contractor net of all discounts, rebates and other applicable credits accruing to or received by the contractor or any assignee under the contract, to the extent those credits are allocable to the allowable portion of the costs billed to the school food authority.
2. (a) The contractor must separately identify for each cost submitted for payment to the school food authority the amount of that cost that is allowable (can be paid from the nonprofit school food service account) and the amount that is unallowable (cannot be paid from the nonprofit school food service account) or  
  
(b) The contractor must exclude all unallowable costs from its billing documents and certify that only allowable costs are submitted for payment and records have been established that maintain the visibility of unallowable costs, including directly associated costs in a manner suitable for contract cost determination and verification.
3. The contractor's determination of its allowable costs must be made in compliance with the applicable departmental and program regulations and Office of Management and Budget cost circulars.
4. The contractor must identify the amount of each discount, rebate and other applicable credit on bills and invoices presented to the school food authority for payment and individually identify the amount as a discount, rebate, or in the case of other applicable

credits, the nature of the credit. If approved by the state agency, the school food authority may permit the contractor to report this information on a less frequent basis than monthly, but no less frequently than annually.

5. The contractor must identify the method by which it will report discounts, rebates and other applicable credits allocable to the contract that are not reported prior to conclusion of the contract.
6. The contractor must maintain documentation of costs and discounts, rebates and other applicable credits, and must furnish such documentation upon request to the school food authority, the state agency, or the department.

*Contracts with Food Service Management Companies -*

Procedures for selecting and contracting with a food service management company (FSMC) shall comply with guidance provided by the Pennsylvania Department of Education, Division of Food and Nutrition, including standard forms, procedures and timelines for solicitation, selection and approval of proposals and contracts. (7 CFR Sec. 210.16, 210.19, 210.21, 215.14a, 220.16)

*Pre-Plated Meals -*

Procedures for selecting and contracting with contractors of pre-plated meals shall comply with guidance provided by the Pennsylvania Department of Education, Division of Food and Nutrition, including standard forms, procedures and timelines for solicitation, selection and approval of proposals and contracts. (7 CFR Sec. 210.16, 210.19, 210.21, 220.16)

KEYSTONE OAKS SCHOOL DISTRICT

# Policy Guide



Policy No. 808

Section OPERATIONS

Title FOOD SERVICES

Adopted AUGUST 21, 1989

Last Revised JUNE 19, 2018;  
AUGUST 16, 2016;  
NOVEMBER 21, 2013;  
MARCH 19, 2001

<b>POLICY NO. 808 FOOD SERVICES</b>	
<b>Section 1</b>	<p><b><u>Purpose</u></b></p> <p>The Board recognizes that students require adequate, nourishing food and beverages in order to grow, learn and maintain good health. The Board directs that students shall be provided with adequate space and time to eat meals during the school day.</p>
<b>Section 2</b>	<p><b><u>Authority</u></b></p> <p>The food service program shall be operated in compliance with all applicable state and federal laws and regulations, as well as federal guidelines established by the Child Nutrition Division of the United States Department of Agriculture (USDA).</p> <p>The District shall ensure that, in the operation of the food service program, no student, staff member, or other individual shall be discriminated against on the basis of race, color, age, creed, religion, gender, sexual orientation, gender identity and expression, ancestry, national origin, marital status, pregnancy, handicap/disability, limited English proficiency, or any other legally protected category.</p>

2 CFR Part 200  
SC 504, 807.1,  
1335, 1337  
42 U.S.C. 1751 et  
seq., 1773  
7 CFR Part 210,  
215, 220

FNS Instruction  
113-1 (USDA)  
7 CFR 210.23  
Pol. 103, 103.1

	<p style="text-align: center;"><b>POLICY NO. 808</b> <b>FOOD SERVICES</b></p>	
	<p>Food sold by the school may be purchased by students and district employees, but only for consumption on school premises or on school-sponsored field trips. The price charged to students shall be established annually by the District in compliance with state and federal laws.</p>	<p>SC 504 42 U.S.C. 1760</p>
	<p>Non-program food shall be priced to generate sufficient revenues to cover the cost of such items. A <b>non-program food</b> shall be defined as a food or beverage, other than a reimbursable meal or snack, which is sold at the school and is purchased using funds from the child nutrition account. <b>Non-program foods</b> include, but are not limited to adult meals and a-la-carte items. All revenue from the sale of non-program food shall accrue to the child nutrition program account.</p>	<p>42 U.S.C. 1760 7 CFR 210.14</p>
<p><b>Section 3</b></p>	<p><b><u>Delegation of Responsibility</u></b></p> <p>The operation and supervision of the food services program shall be the responsibility of the Director of Food Services. The Director of Food Services is responsible for maintaining and monitoring charge records and notifying the parents/guardians of outstanding balances by means of phone calls and messages, written documentation, or any other reasonable means of communication.</p>	
	<p>The Business Manager shall present to the Board each month for its approval a statement of receipts and expenditures for cafeteria funds.</p>	<p>SC 504</p>
	<p>The cafeterias are to be operated on a nonprofit basis. A periodic review of the cafeteria accounts shall be made by the Business Manager monthly and the auditor.</p>	<p>SC 504, 1337</p>
	<p>The Director of Food Services shall ensure that school meals meet the standards required by the School Breakfast Program, the National School Lunch Program and the Special Milk Program.</p>	<p>SC 504, 1335, 1337 42 U.S.C. 1751 et seq., 1773 7 CFR Part 210, 215, 220</p>
	<p>The Superintendent or designee shall comply with state and federal requirements for conducting cafeteria health and safety inspections and ensuring employee participation in inspection services and training programs.</p>	<p>3 Pa. C.S.A. 5713 42 U.S.C. 1758(h) 7 CFR 210.13, 210.31</p>

<p><b>Section 4</b></p>	<p style="text-align: center;"><b>POLICY NO. 808 FOOD SERVICES</b></p> <p>The Superintendent or designee shall develop and disseminate administrative regulations to implement this policy.</p> <p>The Superintendent or designee shall annually notify students, parents/guardians, and employees concerning the contents of this policy and applicable administrative regulations. Notification shall include information related to nondiscrimination.</p> <p><b><u>Guidelines</u></b></p>	<p>FNS Instruction 113-1 (USDA)</p>
	<p>To reinforce the District’s commitment to nutrition and student wellness, foods served in school cafeterias shall:</p> <ol style="list-style-type: none"> <li>1. Be carefully selected to contribute to students’ nutritional well-being and health.</li> <li>2. Meet the nutritional standards specified in laws and regulations and approved by the Board.</li> <li>3. Be prepared by methods that will retain nutritive quality, appeal to students, and foster lifelong healthy eating habits.</li> <li>4. Be served in age-appropriate quantities, at reasonable prices.</li> <li>5. The District shall use USDA Foods for school menus available under the Child Nutrition USDA Foods Programs.</li> </ol>	<p>Pol. 246</p>
	<p>All funds derived from the operation, maintenance or sponsorship of the food service program shall be deposited in the Food Service Account, a special bank account, in the same manner as other funds belonging to the School District. Such funds shall be expended in the manner approved and directed by the Board, but no amount shall be transferred from the Food Services Account to any other account or fund; however, district advances to the food services program may be returned to the district’s general fund from any surplus resulting from its operation.</p>	<p>SC 504</p>

<b>POLICY NO. 808 FOOD SERVICES</b>	
<p>Surplus accounts shall be used only for the improvement and maintenance of the cafeteria.</p>	SC 504
<p><u>Procurement</u></p> <p>Procurement of goods or services for the food service program shall meet the requirements of applicable law, regulations and Board policy and procedures.</p>	Pol. 610, 626, 828
<p><u>Free/Reduced-Price School Meals and Free Milk</u></p> <p>The District shall provide free and reduced-price school meals and/or free milk to students in accordance with the terms and conditions of the National School Lunch Program, the School Breakfast Program, and the Special Milk Program.</p> <p>The District shall conduct direct certification three (3) times per year using the Pennsylvania Student Eligibility System (PA-SES) to identify students who are eligible for free school meal benefits without the need for submission of a household application. Direct certification shall be conducted:</p> <ol style="list-style-type: none"> <li>1. At or around the beginning of the school year.</li> <li>2. Three (3) months after the initial effort.</li> <li>3. Six (6) months after the initial effort.</li> </ol> <p>The District may also conduct direct certification on a weekly or monthly basis.</p>	<p>42 U.S.C. 1758 7 CFR Part 245</p> <p>42 U.S.C. 1758 7 CFR Part 245</p>
<p><u>Accommodating Students With Special Dietary Needs</u></p> <p>The District shall make appropriate food service and/or meal accommodations to students with special dietary needs in accordance with applicable law, regulations and Board policy.</p>	7 CFR 15b.40 Pol. 103.1, 113, 209.1
<p><u>School Food Safety Inspections</u></p> <p>The District shall obtain two (2) safety inspections per year in accordance with local, state, and federal laws and regulations.</p>	42 U.S.C. 1758(h) 7 CFR 210.13, 220.7

**POLICY NO. 808  
FOOD SERVICES**

The District shall post the most recent inspection report and release a copy of the report to members of the public, upon request.

School Food Safety Program

The District shall comply with federal requirements in developing a food safety program that enables district schools to take systematic action to prevent or minimize the risk of foodborne illness among students.

7 CFR Part 210, 220  
42 U.S.C. 1758(h)

The District shall maintain proper sanitation and health standards in food storage, preparation and service, in accordance with applicable state and local laws and regulations and federal food safety requirements.

7 CFR 210.9, 210.13, 220.7

Professional Standards for Food Service Personnel

The District shall comply with the professional standards for school food service personnel who manage and operate the National School Lunch and School Breakfast Programs. For purposes of this policy, **professional standards** include hiring standards for new food service program directors and annual continuing education/training for all individuals involved in the operation and administration of school meal programs. Such professional standards shall apply to both district-operated food service programs and contracted food service programs.

42 U.S.C. 1751 et seq., 1773  
7 CFR 210.31, 210.15

School Meal ~~Service~~Charges and Accounts

To ensure the effective operation of the District's food service program and delivery of school food program meals to students, the District shall:

1. Assign individual school meal accounts to each student for the purchase of meals served in school cafeterias, which ensure that the identity of each student is protected.

<b>POLICY NO. 808 FOOD SERVICES</b>	
<p>2. Notify parents/guardians when the student’s school meal account reaches a low balance.</p> <p>3. Notify parent/guardians when the student’s school meal account reaches a negative balance. The notice shall include information on payment options.</p> <p>4. Provide a school food program meal to each student who does not have the money to pay for the school food program meal or who has a negative balance in <del>their</del><del>his/her</del> school meal account, <b>except as provided below or when,</b> <del>unless</del> the student’s parent/guardian has specifically provided written notice to the District to withhold a school food program meal or to withhold select categories of food items.</p> <p><del>4.</del> If a student is not eligible for free or reduced-price school meals under federal school meal programs and the student's school meal account reaches a negative balance of more than fifty dollars (\$50) in a school year, the District may provide the student with alternative meals instead of school food program meals until the unpaid balance in the student's school meal account is paid or a payment plan has been established with the District to reduce the unpaid balance.[3]</p>	<p>SC 1337</p> <p>SC 1337</p>
<p>When a student owes money for five (5) or more school food program meals, the District shall make at least two (2) attempts to contact the student's parent/guardian and shall provide the application for free/reduced-price school meal benefits to the parent/guardian to apply for benefits under federal school meal programs. The District may offer assistance to parents/guardians with applying for free/reduced-price school meal benefits.</p>	<p>SC 1337 42 U.S.C. 1758 7 CFR Part 245</p>
<p>Communications regarding a low balance or money owed by a student for school meals shall be made to the student's parent/guardian, <del>not the student, unless the student is an emancipated minor.</del></p>	<p>SC 1337</p>
<p>School staff may communicate a low balance or money owed by a student for school meals to a student in grades 9-12; such communication shall be made to the individual student in a discreet manner.</p>	<p>SC 1337</p>



**POLICY NO. 808  
FOOD SERVICES**

The District shall be permitted to contact the student's parent/guardian by means of a letter addressed to the parent/guardian that is delivered by the student.

SC 1337

District schools shall be prohibited from:

SC 1337

1. Publicly identifying or stigmatizing a student who cannot pay for a school food program meal or who has a negative school meal account balance. [It shall not constitute public identification or stigmatization of a student for a school to restrict privileges and activities of students who owe money for school meals if those same restrictions apply to students who owe money for other school-related purposes, or to provide a student with an alternative meal as provided above.](#)
2. Requiring a student who cannot pay for a school food program meal to perform chores or other work to pay for the meal, unless chores or other work are required of all students regardless of their ability or inability to pay for a school food program meal.
3. Requiring a student to discard a school food program meal after it was served to the student due to the student's inability to pay for the meal or due to a negative school meal account balance unless a parent/guardian has provided notice to the District to restrict or deny items.

This policy and any applicable procedures or administrative regulations regarding school meal charges and school meal accounts shall be communicated annually to school administrators, school food service personnel, other appropriate school staff, and contracted food service personnel.

The District shall provide parent/guardians with information about this policy and any applicable procedures or administrative regulations at the start of each school year, when a student enrolls in school after the start of the school year, and when a parent/guardian is notified of a negative school meal account balance.

Information about this policy and any applicable procedures or

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FOOD SERVICES**

administrative regulations for parents/guardians, student and staff will be available via the District website, student handbooks, newsletters, posted notices and/or other efficient communication methods.

Collection of Unpaid Meal Charges

Unpaid charges will be carried on a student's account from year to year and will travel with the student throughout their enrollment in the District.

Reasonable efforts shall be made by the District to collect unpaid meal charges from parents/guardians. Efforts taken in the collection shall not have a negative impact on the student involved, but shall focus primarily on the parent/guardians responsible for providing funds for meal purchases. Negligent debt will be sent to the local Magistrate for collection, and parent(s)/guardian(s) are responsible for all court costs and fees assigned by the magistrate for the collection of monies due to the cafeteria.

References:

School Code – 24 P.S. 504, 807.1, 1335, 1337

Uniform Administrative Requirements, Cost Principals, and Audit Requirements for Federal Awards – 2 CFR Part 200

U.S. Code Chapter 13 School Lunch Programs – 42 U.S.C. 1751 et seq., 1758, 1760, 1773

National School Lunch Program – 7 CFR Part 210, 210.9, 210.13, 210.30, 215, 220, 220.7, 245

7 CFR 15b.40 – Food Services  
FNS Instruction 113-1 (USDA)

Title 3 School Cafeterias and Organized Camps – 3 Pa. C.S.A. 5713

**POLICY NO. 808  
FOOD SERVICES**

Board Policy – 103, 103.1, 113, 209.1, 246, 610, 626, 808.1

Revision History: June 19, 2018; August 16, 2016; November 21, 2013; March 19, 2001

KEYSTONE OAKS SCHOOL DISTRICT

# Policy Guide



Policy No. 81909

Section OPERATIONS

Title SUICIDE AWARENESS PREVENTION AND RESPONSE

Adopted NOVEMBER 17, 2015

Revised \_\_\_\_\_

<b>POLICY NO. 81909</b>		
<b>SUICIDE AWARENESS, PREVENTION AND RESPONSE</b>		
<b>Section 1</b>	<p><b><u>Purpose</u></b></p> <p>The Board is committed to maintaining a safe school environment; to protect the health, safety and welfare of its students; to promote healthy development; and to safeguard against the threat or attempt of suicide among school-aged youth. This policy supports <a href="#">the provision of a comprehensive district program designed to promote behavioral health and prevent suicide</a>. <del>federal, state and local efforts to provide education on youth suicide awareness and prevention; establish methods of prevention, intervention and response to suicide or suicide attempt; and promote access to suicide awareness and prevention resources. The impact of students' mental health on their academic performance and the effect of mental health issues and suicide on students and the entire school community are significant.</del></p> <p><del>Therefore, in order to ensure the safety and welfare of students, the District will work to educate school personnel and students on the actions and resources necessary to prevent suicide and promote mental well-being.</del></p>	<p>SC 1526 Pol. <a href="#">103</a>, 103.1, <del>248</del>, 256, 806</p>
<b>Section 2</b>	<p><b><u>Authority</u></b></p> <p>The Board directs the District to provide education on youth suicide awareness and prevention; to establish methods of prevention, intervention, and response to suicide attempt or suicide death; and to promote access to suicide awareness and prevention resources.</p>	<p>SC 1526 Pol. <a href="#">103</a>, 103.1, 806</p>

<p>Section 3</p>	<p style="text-align: center;"><b>POLICY NO. 81909</b>  <b>SUICIDE AWARENESS, PREVENTION AND RESPONSE</b></p> <p>The District shall notify employees, students and parents/guardians of this policy and shall post the policy on the District’s website.</p> <p><del>In compliance with state law and regulations and in support of the Keystone Oaks School District’s suicide prevention measures, this policy shall apply in any situation where a student is expressing suicidal thoughts or intentions of self-harm on school property, at any school sponsored activity, or on any public vehicle providing transportation to or from a school or school-sponsored activity. This policy shall also apply following a student’s suicide threat or attempt that does not occur on school grounds or during a school-sponsored activity, but that is reported to any school personnel. Information received in confidence from a student may be revealed to the student’s parents/guardians, the program supervisor, building principal or other appropriate authority when the health, welfare or safety of the student or any other person is deemed to be at risk.</del></p> <p><b><u>Definitions</u></b></p> <p><b>Behavioral health</b> – the promotion of emotional health; the prevention of mental illnesses and substance use disorders; and treatment and services for substance abuse, addiction, substance use disorders, mental illnesses and/or mental disorders.</p> <p><del><b>At-Risk for Suicide</b> shall mean any youth with risk factors or warning signs that increase the likelihood of suicidal behavior.</del></p> <p><del><b>Crisis Response Team</b> shall include, but may not be limited to, the administrators, guidance counselors, the school nurse, mental health therapists, and school resource officers, and/or other members of the Student Assistance Program (SAP), as designated, and may include other members as deemed appropriate by the Superintendent. Community mental agency resources may be called for assistance to be a part of the team.</del></p> <p><del><b>Expressed Suicidal Thoughts or Intentions</b> shall mean a verbal or nonverbal communication that an individual intends to harm him/herself with the intention to die, but has not acted on the behavior.</del></p> <p><del><b>Prevention</b> refers to efforts that seek to reduce the factors that increase the risk for suicidal thoughts and behaviors and increase</del></p>	<p>SC 1526</p> <p>Title 22 Sec. 12.12  Pol. 216</p>
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	<p style="text-align: center;"><b>POLICY NO. 81909</b></p> <p style="text-align: center;"><b>SUICIDE AWARENESS, PREVENTION AND RESPONSE</b></p> <p><del>the factors that help strengthen, support, and protect individuals from suicide.</del></p> <p><del><b>Risk Factors</b> shall mean the personal or environmental characteristics associated with suicide. People affected by one or more of these risk factors have a greater probability of suicidal behavior.</del></p> <p><del><b>School Connectedness</b> shall mean the belief by students that adults and peers in the school care about their learning as well as about them as individuals.</del></p> <p><del><b>School Personnel</b> include, but may not be limited to, administrators, teachers, paraprofessionals, support staff, coaches, custodians, and cafeteria workers.</del></p> <p><del><b>Suicide</b> shall refer to death caused by self-directed injurious behavior with any intent to die as a result of the behavior.</del></p> <p><del><b>Suicidal Act or Suicide Attempt</b> shall mean a potentially self-injurious behavior for which there is evidence that the person probably intended to kill him/herself; a suicidal act may result in death, injuries, or no injuries.</del></p> <p><del><b>Warning Signs</b> are evidence-based indicators that someone may be in danger of suicide, either immediately or in the very near future.</del></p> <p><b>Section 4</b></p> <p><b><u>Guidelines</u></b></p> <p>The District shall utilize a multifaceted approach to suicide prevention which integrates school and community-based supports.</p> <p><del>The District shall notify district employees, students and parents/guardians of this policy and shall post the policy on the district's website.</del></p> <p style="text-align: center;"><b>SUICIDE AWARENESS AND PREVENTION EDUCATION</b></p> <p>-</p> <p><u>Protocols for Administration of Student Education</u></p>	<p style="text-align: right;">SC-1526</p> <p style="text-align: right;">SC 1526</p>
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**POLICY NO. 81909**

**SUICIDE AWARENESS, PREVENTION AND RESPONSE**

Students shall receive age-appropriate education lessons in their classrooms through health education or other appropriate curricula on the importance of safe and healthy choices, coping strategies, how to recognize risk factors and warning signs, as well as help-seeking strategies for self or others including how to engage school resources and refer peers for help.

Lessons shall:

1. -Ceontain information on comprehensive health and wellness, including emotional, behavioral and social skills development.
2. Inform students about broader behavioral health issues such as depression and substance abuse, as well as specific risk factors, protective factors and warning signs for suicide.
3. Encourage students to seek help for themselves or their peers, including when concerns arise via social media or other online forum, and to avoid making promises of confidence when they are concerned about the safety of a peer. ~~Students shall be taught not to make promises of confidentiality when they are concerned about a peer or significant other.~~
4. Adhere to safe and effective messaging guidelines -and include reputable suicide prevention resources.
5. Promote a healthy school climate where students feel connected to and can identify trusted adults in the building.
6. These lessons may be taught by health and physical education teachers, community service providers, classroom teachers or student services staff. Students who are in need of intervention shall be referred in accordance with the District's referral procedures for screening and recommendations.

~~Student education may include but is not limited to the following:-~~

SC-1526  
Pol. 333

**POLICY NO. 81909**  
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- ~~1. Information about suicide prevention. Resources are available on the Pennsylvania Department of Education's (PDE's) website [www.education.pa.gov](http://www.education.pa.gov)~~
- ~~2. Help-seeking approaches amongst students, promoting a climate that encourages peer referral and emphasizes school connectedness.~~
- ~~3. Increasing students' ability to recognize if they or their peers are at risk for suicide.~~
- ~~4. Addressing problems that can lead to suicide, such as depression and other mental health issues, anger, and drug use.~~

Protocols for Administration of Employee Education

All District employees shall receive information about regarding risk factors, warning signs, response procedures, referrals, and resources regarding youth suicide awareness and prevention.

As part of the District's professional development plan, professional educators in school buildings serving students in grades six (6) through twelve (12) shall participate in a minimum of four (4) hours of youth suicide awareness and prevention training at least every five (5) years. Professional educators in school buildings serving students in grades kindergarten through five (5) shall participate in two (2) hours of youth suicide awareness and prevention training at least every (5) years.

Additional professional development in suicide risk screening and/or assessment and crisis intervention shall be provided to specialized staff and school behavioral health professionals such as school crisis response/intervention team members, designated administrators, school counselors, District mental health professionals, social workers, school nurses and school psychologists.

SC 1526  
Pol. 833



	<p style="text-align: center;"><b>POLICY NO. 81909</b></p> <p style="text-align: center;"><b>SUICIDE AWARENESS, PREVENTION AND RESPONSE</b></p> <p><u>Resources for Parents/Guardians</u></p> <p>The District may provide parents/guardians with resources including, but not limited to, health promotion and suicide risk, including characteristics and warning signs; and information about local behavioral/mental health resources.</p> <p style="text-align: center;"><b><u>METHODS OF PREVENTION</u></b></p> <p>The methods of prevention utilized by the District include, but are not limited to, early identification and support for students at risk; education for students, staff and parents/guardians; and delegation of responsibility for planning and coordination of suicide prevention efforts.</p> <p>In support of the District’s suicide prevention mission, information received in confidence from a student may be revealed to the student’s parents/guardians, the building principal or other appropriate authority when the health, welfare or safety of the student or any other person is clearly in jeopardy.</p> <p><u>Suicide Prevention Coordinators</u></p> <p><i>District-wide:</i></p> <p>A District-wide suicide prevention coordinator shall be designated by the Superintendent. This may be an existing District employee. The District Suicide Prevention Coordinator shall be responsible for planning and coordinating implementation of this policy. The District Suicide Prevention Coordinator shall investigate on cases involving peer-to-peer harassment, as required under federal law and Board Policy. The designee will help identify overlapping risk factors, including hostile environments created by persistent or severe harassment on the basis of gender, race, disability, or other protected classes.</p> <p><i>Building Level:</i></p> <p>Any school personnel who are made aware of any threat or witnesses any attempt towards self-harm that is written, drawn,</p>	<p>SC 1526</p> <p>22 PA Code 12.12 Pol. 207, 216</p>
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spoken, or threatened shall immediately notify the building principal or the District-wide Suicide Prevention Coordinator.

Any threat in any form shall be treated as real and dealt with immediately. No student should be left alone, nor confidentiality promised. In cases of life-threatening situations, a student's confidentiality will be waived. The school entity's crisis response procedures shall be implemented.

~~If an expressed suicidal thought or intention is made known to any school personnel during an afterschool program and the building principal or the Suicide Prevention Coordinator are not available, the school personnel shall call the Allegheny County Crisis Intervention Hotline 1-866-796-8226, 1-800-SUICIDE, or 1-800-273-TALK for help. Thereafter, immediately inform the principal of the incident and actions taken.~~

Early Identification Procedures

Early identification of individuals with ~~one (1) or more~~ suicidal risk factors or ~~of individuals exhibiting~~ warning signs, is crucial to the District's suicide prevention efforts. To promote awareness, district employees, students and parents/guardians should be educated about suicidal risk factors and warning signs.

**Suicide Risk factors** refer to personal or environmental characteristics that are associated with suicide. ~~including, but are not limited to:~~

- ~~● Behavioral Health Issues/Disorders:
  - ~~— Depression~~
  - ~~— Substance abuse or dependence~~
  - ~~— Long term use of a medication that according to the FDA may lead to increased risk of suicide~~
  - ~~— Previous suicide attempts~~
  - ~~— Self-injury~~~~
  
- ~~● Personal Characteristics:
  - ~~— Hopelessness/Low self-esteem~~
  - ~~— Loneliness/social alienation/isolation/lack of belonging~~
  - ~~— Poor problem solving or coping skills~~
  - ~~— Impulsivity/risk-taking/recklessness~~~~

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- ~~Adverse/Stressful Life Circumstances:~~
  - ~~Interpersonal difficulties or losses~~
  - ~~Disciplinary or legal problems~~
  - ~~Bullying (victim or perpetrator)~~
  - ~~School or work issues~~
  - ~~Physical, sexual or psychological abuse~~
  - ~~Exposure to peer suicide~~
  
- ~~Family Characteristics:~~
  - ~~Family history of suicide or suicidal behavior~~
  - ~~Family mental health problems~~
  - ~~Divorce/death of parent/guardian~~
  - ~~Parental child relationship~~

**Warning signs** are ~~evidence-based indicators~~ **indications** that someone may be in danger of suicide, either immediately or in the near future. ~~Warning signs include, but are not limited to:~~

- ~~Expressions such as hopelessness, rage, anger, seeking revenge, feeling trapped, anxiety, agitation, no reason to live or sense of purpose~~
  
- ~~Recklessness or risky behavior~~
  
- ~~Increase alcohol or drug use~~
  
- ~~Withdrawal from friends, family or society~~
  
- ~~Dramatic mood changes~~

SC-1526

Referral Procedures

Any District employee who ~~observes~~ **has identified** a student ~~exhibiting~~ ~~with one (1) or more risk factors,~~ a warning signs ~~for~~ ~~or who has an indication that student may be contemplating~~ suicide or ~~has another indication that a student may be~~ **contemplating suicide,** ~~self-harm,~~ shall refer the student for **suicide risk screening and/or** ~~further~~ assessment and intervention

Pol. 806

	<p style="text-align: center;"><b>POLICY NO. 81909</b></p> <p style="text-align: center;"><b>SUICIDE AWARENESS, PREVENTION AND RESPONSE</b></p> <p>in accordance with district procedures <del>to the school counselors.</del></p> <p>In the absence of a warning sign for suicide, students demonstrating suicide risk factors that appear to be adversely impacting the student should be referred to the Student Assistance Program for support and follow-up.</p> <p><u>Documentation</u></p> <p>The District shall document the reasons for referral, including specific warning signs and <b>suicide</b> risk factors identified as indications that the student may be at risk.</p> <p style="text-align: center;"><b>METHODS OF INTERVENTION</b></p> <p>The methods of intervention utilized by the District include, but are not limited to, responding to suicide threats, suicide attempts in school, suicide attempts outside of school and <del>complete</del> suicide <del>death</del>. -Suicide intervention procedures shall address the development of <del>an emotional or mental health</del> safety plan for students identified as being at increased risk of suicide.</p> <p><u>Procedures for Students at Risk</u></p> <p>A district-approved suicide <b>risk screening or</b> assessment <del>tool</del><del>instrument</del> may be used<del>utilized</del> by trained <del>behavioral</del><del>mental</del> health staff such as school counselors, school psychologists, or social workers.</p> <p>Parents/Guardians of a student identified as being at risk shall be notified by the school <b>and informed of crisis and community resources</b>. If the school suspects that the student’s risk status is the result of abuse or neglect, school staff shall immediately notify Children and Youth Services.</p> <p>If the parent or guardian refuses to cooperate and there is any doubt regarding the child’s safety, the school personnel <b>will refer to internal procedures, which may include pursuing a 302 involuntary mental assessment</b><del>who directly witnessed the expressed suicidal thought or intention will pursue a 302 involuntary mental health assessment by calling County Emergency Services at 412-350-4457 and ask for a delegate.</del></p>	<p>SC 1526</p> <p><del>Pol. 103.1, 113, 113.1, 114</del></p> <p><del>Pol. 103.1, 113, 113.1, 114</del></p> <p>Pol. 806</p> <p><del>SC-1526</del></p>
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	<p style="text-align: center;"><b>POLICY NO. 81909</b></p> <p style="text-align: center;"><b>SUICIDE AWARENESS, PREVENTION AND RESPONSE</b></p> <p><del>The delegate will listen to concerns and advise on the course of action. If a 302 involuntary mental health assessment is granted, the first hand witness will need to be the petitioner, with support from the principal or other central office administrator.</del></p> <p>The District shall identify <del>behavioral</del> <b>mental</b> health service providers to whom students can be referred for further assessment and assistance.</p> <p><b>Behavioral</b> <del>Mental</del> <b>health service providers</b> may include, but are not limited to, hospital emergency departments, psychiatric hospitals, community <del>behavioral</del> <b>mental</b> health centers, psychiatrists, psychologists, social workers and primary care providers.</p> <p><del>If the student is identified as being at increased risk of suicide,</del> <b>The District shall create an new, or update a previous, emotional or mental health safety plan to support thea student and the student’s family if the student has been identified as being at increased risk of suicide. The safety plan should be developed collaboratively with input from the student and reviewed with the student’s family.</b></p> <p><u>Students with Disabilities</u></p> <p>For students with disabilities, who are identified as being at-risk for suicide or who attempt suicide, the appropriate team shall be notified and shall address the student’s needs in accordance with applicable law, regulations and Board policy.</p> <p>If a student is identified as being at-risk for suicide or attempts suicide and <del>the student may</del> <b>requires</b> special education services or accommodations, the Supervisor of Special Education shall be notified and shall take action to address the student’s needs in accordance with applicable law, regulations and Board policy.</p> <p><u>Documentation</u></p> <p>The District shall document observations, recommendations and actions conducted throughout the intervention, <del>suicide risk screening and/or and-assessment and follow-up</del> <b>process</b>, including verbal and written communications with students, parents/guardians and <del>behavioral</del> <b>mental</b> health service providers.</p>	<p>Pol. 103.1, 113, 113.2, 113.3, <del>114</del> <b>117, 204</b></p> <p>Pol. 103.1, 113, 113.2, 113.3, <del>114</del> <b>204</b></p>
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**POLICY NO. 81909**  
**SUICIDE AWARENESS, PREVENTION AND RESPONSE**

The Superintendent or designee shall develop administrative regulations providing recommended guidelines for responding to a suicide threat.

**METHODS OF RESPONSE TO SUICIDE-OR-SUICIDE ATTEMPT OR SUICIDE DEATH**

SC 1526

The District shall maintain a trained school crisis response/crisis intervention team. Team members shall include, but not be limited to, designated administrators, school counselors, school nurse, school psychologist, social worker, School Resource Officers, members of the Student Assistance Program Team, and others as designated by the district such as community behavioral health agency resources.

Response to Suicide Attempt

The ~~M~~methods of response to ~~suicide-or~~ a suicide attempt utilized by the District include, but are not limited to:

1. Determining the roles and responsibilities of each crisis response team member.
- ~~1~~2. Notifying students, employees and parent/guardians.
- ~~2~~3. Working with families.
- ~~3~~4. Responding appropriately to the media.
- ~~4~~5. Collaborating with community providers.

~~SC-1526~~

The Superintendent or designee shall develop administrative regulations with recommended guidelines for responding to a ~~suicideal-act-or~~ attempt on school grounds or during a school-sponsored event.

Re-Entry Procedures

	<p style="text-align: center;"><b>POLICY NO. 81909</b></p> <p style="text-align: center;"><b>SUICIDE AWARENESS, PREVENTION AND RESPONSE</b></p> <p>A student’s excusal from school attendance after <del>an absence due to significant psychological and/or behavioral health crisis</del><del>distress</del> and the student’s return to school shall be consistent with state and federal laws and regulations.</p> <p>Prior to a student returning to school after a behavioral health crisis, <del>a</del> District-employed <del>contracted behavioral mental</del> health professional, the building principal, <del>the school counselor</del> or suicide prevention coordinator shall meet with the parents/guardians of <del>the</del> student <del>returning to school after an absence due to significant psychological and/or behavioral distress</del>, and, if appropriate, meet with the student <del>to discuss re-entry and applicable next steps</del> to ensure the student’s readiness to return to school <del>and to create an individual re-entry plan</del>.</p> <p>When authorized by the student’s parent/guardian, the designated District employee shall coordinate with the appropriate outside <del>behavioral mental</del> health care providers, <del>request written documentation from the treating facility and encourage their involvement in the re-entry meeting</del>.</p> <p>The designated District employee will periodically check-in, as needed, with the student to <del>monitor the student’s progress</del>, facilitate the transition back into the school community and address any concerns.</p> <p><del>Re-entry of a student with a disability requires coordination with the appropriate team to address the student’s needs in accordance with applicable law, regulations and Board policy.</del></p> <p style="text-align: center;"><b>REPORT PROCEDURES</b></p> <p>Effective documentation assists in preserving the safety of the student and ensuring communication among school staff, parents/guardians and mental health service providers.</p> <p>When a District employee takes notes on any conversations or situations involving or relating to an at-risk student, the notes should contain only factual or directly observed information, not opinions or hearsay.</p> <p>As stated in this policy, District employees shall be responsible for effective documentation of incidents involving suicide</p>	<p>Pol. 103.1, 113, 113.2, 113.3, 117, 204</p> <p>Pol. 103.1, 113, 113.2, 113.3, 114</p>
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**POLICY NO. 81909**

**SUICIDE AWARENESS, PREVENTION AND RESPONSE**

prevention, intervention and response.

The District Suicide Prevention Coordinator shall provide the Superintendent or designee with a copy of all reports and documentation regarding the at-risk student. Information and reports shall be provided, as appropriate, to school counselors, District mental health professionals and school nurses.

**SUICIDE AWARENESS AND PREVENTION  
RESOURCES**

A listing of resources regarding suicide awareness and prevention shall be attached to this policy.

References:

School Code – 24 P.S. Sec. 1526

State Board of Education Regulations – 22 PA Code Sec. 12.12

2012 National Strategy for Suicide Prevention: Goals and Objectives for Action

Board Policies –103, 103.1, 113, 113.1, 113.2, 113.3, 114, 117, 146, 204, -207, 216, -248, -249, 256, 333, 806



## **Suicide Awareness and Prevention Resources ~~For Schools~~**

### **Crisis Contacts:**

- National Suicide Prevention Lifeline: 1-800-273-TALK (8255) or visit <http://www.suicidepreventionlifeline.org/>
- Crisis Text Line: TEXT 741-741 or visit <http://www.crisistextline.org/>
- Allegheny County resolve Crisis Services 1-888-7-YOU-CAN  
<https://www.upmc.com/services/behavioral-health/resolve-crisis-services>
- List of County CASSP and Children’s Behavioral Health Contact Persons  
[https://www.dhs.pa.gov/Services/Mental-Health-In-PA/Documents/CASSP/CASSP-Coordinators\\_01082020.pdf](https://www.dhs.pa.gov/Services/Mental-Health-In-PA/Documents/CASSP/CASSP-Coordinators_01082020.pdf)

### **National and State Organization Resources:**

- American Association of Suicidology (AAS): <http://www.suicidology.org/>
- American Foundation for Suicide Prevention (AFSP): <https://www.afsp.org/>
- Suicide Prevention Resource Center (SPRC): <http://www.sprc.org/>
- Prevent Suicide PA: <http://www.preventsuicidepa.org/>
- Jana Marie Foundation: <http://www.janamariefoundation.org/>
- Aavidum: <http://aavidum.com/cms/>
- Services for Teens at Risk (STAR-Center)  
<https://www.starcenter.pitt.edu/STAR-Center-Home/1/Default.aspx>
- Pennsylvania Department of Education [www.education.state.pa.us](http://www.education.state.pa.us)
- Substance Abuse and Mental Health Services Administration (SAMHSA) Preventing Suicide: A Toolkit for High Schools <https://store.samhsa.gov/product/Preventing-Suicide-A-Toolkit-for-High-Schools/SMA12-4669>

~~\*\*\*Please note that the resources listed here are free of charge. There are many more excellent resources for minimal cost.~~

~~**General Information** (many with webinar sessions)~~

~~**PA Youth Suicide Prevention Initiative Mission** <http://www.payspi.org/>~~

**Mission**—The Pennsylvania Youth Suicide Prevention Initiative is a multi-system collaboration to reduce youth suicide.

**Vision**—Youth suicide prevention will be embraced and incorporated into the fabric of every community in Pennsylvania to address the social and emotional needs of youth at risk and survivors of suicide.

**Suicide Prevention Resource Center**—<http://www.sprc.org/>

SPRC is the nation's only federally supported resource center devoted to advancing the *National Strategy for Suicide Prevention*. They provide technical assistance, training, and materials to increase the knowledge and expertise of suicide prevention practitioners and other professionals serving people at risk for suicide. They also promote collaboration among a variety of organizations that play a role in developing the field of suicide prevention.

**Toolkit for High Schools**—<http://store.samhsa.gov/product/SMA12-4669>

Assists high schools and school districts in designing and implementing strategies to prevent suicide and promote behavioral health. Includes tools to implement a multi-faceted suicide prevention program that responds to the needs and cultures of students. Released in June 2012.

**American Foundation for Suicide Prevention**—<http://www.afsp.org/>

The American Foundation for Suicide Prevention has been at the forefront of a wide range of suicide prevention initiatives—each designed to reduce loss of life from suicide. They are investing in groundbreaking research, new educational campaigns, innovative demonstration projects and critical policy work. And they are expanding their assistance to people, whose lives have been affected by suicide, reaching out to offer support and offering opportunities to become involved in prevention.

**American Association of Suicidology**—<http://www.suicidology.org/home>

AAS is a membership organization for all those involved in suicide prevention and intervention, or touched by suicide. AAS is a leader in the advancement of scientific and programmatic efforts in suicide prevention through research, education and training, the development of standards and resources, and survivor support services.

**Services for Teens At Risk (STAR Center)**—<http://www.starcenter.pitt.edu/>

Services for Teens At Risk (STAR Center) is a comprehensive research, treatment, and training center. Funded by the State of Pennsylvania's General Assembly in 1986 to address adolescent suicide and depression, the program provides individual assessment and treatment to teens that are experiencing depression and suicidality. They also provide community education

services about depression and suicidality to schools, social service agencies, churches and other organizations that request them.

**The Trevor Project** — <http://www.thetrevorproject.org/>

The Trevor Project is the leading national organization providing crisis intervention and suicide prevention services to lesbian, gay, bisexual, transgender, and questioning youth.

**National Alliance on Mental Illness (NAMI)** — <https://www.nami.org/About-NAMI>

NAMI, the National Alliance on Mental Illness, is the nation's largest grassroots mental health organization dedicated to building better lives for the millions of Americans affected by mental illness.

## **Comprehensive School Guide**

**Youth Suicide Prevention School-Based Guide** — <http://theguide.fmhi.usf.edu/>

The Youth Suicide Prevention School-Based Guide is designed to provide accurate, user-friendly information. The Guide is not a program but a tool that provides a framework for schools to assess their existing or proposed suicide prevention efforts (through a series of checklists) and provides resources and information that school administrators can use to enhance or add to their existing program. First, checklists can be completed to help evaluate the adequacy of the schools' suicide prevention programs. Second, information is offered in a series of issue briefs corresponding to a specific checklist. Each brief offers a rationale for the importance of the specific topic together with a brief overview of the key points. The briefs also offer specific strategies that have proven to work in reducing the incidence of suicide, with references that schools may then explore in greater detail. A resource section with helpful links is also included. The Guide provides information to school to assist them in the development of a framework to work in partnership with community resources and families.

## **School Policy**

**Model School Policy on Suicide Prevention** —

[https://www.afsp.org/content/download/10555/186750/file/Model%20Policy\\_FINAL.pdf](https://www.afsp.org/content/download/10555/186750/file/Model%20Policy_FINAL.pdf)

Written by American Foundation for Suicide Prevention, National Association of School Psychologists, American School Counselor Association, and The Trevor Project. This modular, adaptable document will help educators and school administrators implement comprehensive suicide prevention policies in communities nationwide.

**STAR Center Sample School Suicide Policy and Procedure** —

## **Training for School Staff**

### **Society for Prevention of Teen Suicide** ————— <http://www.sptsusa.org/>

The mission of the Society for the Prevention of Teen Suicide is to reduce the number of youth suicides and attempted suicides by encouraging overall public awareness through the development and promotion of educational training programs for teens, parents and educators.

The free, interactive series Making Educators Partners in Suicide Prevention is designed to be completed at the viewer's own pace. Pennsylvania school staff requiring Act 48 hours may submit the certificate of completion to [c-paschool@pa.gov](mailto:c-paschool@pa.gov) or fax it to 717-783-4790, along with your Dept. of Education Professional ID number, to have these hours submitted.

### **More Than Sad Program** ————— <http://www.afsp.org/preventing-suicide/our-education-and-prevention-programs/programs-for-professionals/more-than-sad-suicide-prevention-education-for-teachers-and-other-school-personnel>

The More Than Sad Program of the American Foundation for Suicide prevention provides education about factors that put youth at risk for suicide, in particular depression and other mental disorders. Instructional materials accompany the More Than Sad Program, including a power point presentation.

**American Foundation for Suicide Prevention** (<http://www.afsp.org/>) — PA AFSP chapters will make the “More Than Sad” DVD available **free** to all high and middle schools in PA that request one. **Contact Pat Gainey to receive your copy.** Patricia Gainey, Regional Director, American Foundation for Suicide Prevention, Greater Philadelphia Regional Office, 3535 Market Street, Suite 4047, Philadelphia, PA 19104; Office: (215)746-7256

### **Suicide Prevention Resource Center — Best Practice Registry** ————— <http://www.sprc.org/bpr>

The purpose of the Best Practices Registry (BPR) is to identify, review, and disseminate information about best practices that address specific objective of *the National Strategy for Suicide Prevention*. The BPR is a collaborative project of the Suicide Prevention Resource Center (SPRC) and the American Foundation for Suicide Prevention (AFSP). It is funded by the Substance Abuse and Mental Health Services Administration (SAMHSA). May of the best practice resources listed have to be purchased.

## **Material for Students**

**More Than Sad Program** — <http://www.afsp.org/preventing-suicide/our-education-and-prevention-programs/programs-for-teens-and-young-adults/more-than-sad-teen-depression>  
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### **Wisconsin Department of Public Instruction**

The curriculum is not SPRC listed, but does use elements of SOS and Lifelines.

<http://ssp.wi.gov/ssp-suicideprev-main-page>

Link to Student programs: <http://ssp.wi.gov/ssp-spstudentprograms>

Link to Curriculum: <http://ssp.wi.gov/ssp-suicideprevcurriculum>

### **Postvention Assistance**

**Services for Teens At Risk (STAR Center)** — <http://www.starcenter.pitt.edu/>

Services for Teens At Risk (STAR Center) is a comprehensive research, treatment, and training center. Funded by the State of Pennsylvania’s General Assembly in 1986 to address adolescent suicide and depression, the program provides individual assessment and treatment to teens that are experiencing depression and suicidality. They also provide community education services about depression and suicidality to schools, social service agencies, churches and other organizations that request them. Any PA school can contact the STAR Center for assistance in

the aftermath of a suicide or other tragic loss. STAR Center can also provide in-service training and resource materials on a variety of mental health related topics.

**Suicide Prevention Resource Center Postvention Toolkit**

<http://www.sprc.org/sites/sprc.org/files/library/AfteraSuicideToolkitforSchools.pdf>

This toolkit is designed to assist schools in the aftermath of a suicide (or other death) in the school community. It is meant to serve as a practical resource for schools facing real-time crises to help them determine what to do, when, and how. The toolkit reflects consensus recommendations developed in consultation with a diverse group of national experts, including school-based personnel, clinicians, researchers, and crisis response professionals. It incorporates relevant existing material and research findings as well as references, templates, and links to additional information and assistance.

Compiled by the: PA Youth Suicide Prevention Initiative: [www.payspi.org](http://www.payspi.org)

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