

FEDERAL AWARDS COMPLIANCE

In accordance with federal requirements under 2 CFR Part 200, generally accepted accounting principles (GAAP) and applicable Governmental Account Standards Board (GASB) standards, the Ogden Community School District shall account for and report federal awards in compliance with all applicable federal requirements governing the receipt and expenditure of federal awards. The district shall maintain the following:

Mandatory Disclosures 2 CFR 200.113

The district shall disclose violations of federal criminal law involving fraud, bribery, or gratuity violations potentially affecting a federal award.

Financial Management 2 CFR Part 200.302

The district will maintain a financial management system with internal controls and transparency that identifies all federal awards received and expended and the federal programs under which they were received. Federal awards must be accurate and current, recorded in appropriate records complete with reporting and record maintenance sufficiently identifying amount, source, expenditure and application of funds. The district will compare actual expenditures to budgeted amounts regularly with effective control over and accountability of all funds, property, and assets.

Internal Controls 2 CFR Part 200.303

The district will maintain internal controls over federal awards. Internal controls shall be consistent with guidance provided in the U.S. Government Accountability Office Standards for Internal Control in the Federal Government (Green Book) and/or the COSO Internal Control Framework. These controls are designed to ensure compliance with federal statutes and regulations, safeguard funds, property, sensitive data and other assets. Internal controls monitor compliance and evaluate risks, taking prompt action when instances of noncompliance are identified. They include cybersecurity measures for electronic records.

Payment Procedures 2 CFR 200.305

Federal funds used to pay employees in full or in part must be regulated through the district's payment procedures, which include time and effort tracking. The district shall maintain written procedures for payment management in accordance with Uniform Guidance. Federal funds shall be drawn down only as needed to meet immediate cash requirements and in a manner that minimizes the time elapsing between receipt and disbursement. Compensation charged to federal awards shall be supported by records that accurately reflect the work performed.

Allowability of Costs 2 CFR 200 Subpart E 200.403 - 200.405

All costs charged to federal awards must comply with applicable cost principles. Costs shall also be accounted for in accordance with applicable GASB standards and district accounting policies. All allowable costs must be documented and conform to federal, state, and program-specific rules.

Procurement Standards 2 CFR 200.317 – 200.327; 200.318(c)(1)

The district must maintain written procurement procedures ensuring full and open competition. The district must use appropriate methods, which include required federal contract provisions and verifying contractors are not suspended or debarred. Procurement procedures shall address conflict of interest standards, methods of procurement, including micro-purchases, small purchases, sealed bids, competitive proposals, and noncompetitive procurements, as applicable under federal regulations. The district will maintain procurement records detailing method, selection and price analysis.

Additionally, the district will maintain standards of conduct governing employees engaged in these procurement activities. This includes prohibiting participation in decisions where personal or financial interests exist, requiring disclosure of potential conflicts and enforcing disciplinary actions for violations.

Reporting 2 CFR 200.328 – 329

The district will submit required financial and performance reports in accordance with federal requirements. The reporting must be accurate, complete and submitted in a timely manner in accordance with the conditions of the federal award. The district shall maintain supporting documentation for all reports submitted.

Record Retention 2 CFR 200.334-337

The district shall retain records related to federal awards for a minimum of [*insert district's retention years, must be at least 5 years*] from the date of submission of the final expenditure report, unless a longer retention period is required. Records are available for inspection and audit by authorized entities in accordance with federal requirements.

Legal References: Iowa Code § 257; 11
281 I.A.C. 97; 98
2 C.F.R. Pt. 200

Cross References: 701.5 Fiscal Management
704.1 Local-State-Federal-Miscellaneous Revenue
704.2 Local- State- Federal- Miscellaneous Revenue
704.3 Investments
705.1 Purchasing-Bidding

Approved August 10, 2026

Reviewed _____,

Revised _____