

## FINANCE REVIEW CHECKLIST

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Compliance is determined through a review of evidence contained in district documents, State documents, and onsite evidence.

### Definitions

**District Documents** – The district must provide these documents. Desk Review Documents must be uploaded to GEMS prior to the visit. Do NOT submit duplicate documents. These required documents must be submitted; optional documents should be submitted only if they provide evidence of compliance.

**State Documents** – MDE/OCTE has these documents. Do NOT submit them.

**Onsite Evidence** – Onsite documents, hard copy or electronic, that contain information subject to privacy laws. Onsite evidence also includes notes generated by interviews with business officials and administrators.

### F01 LEVEL OF EFFORT: SUPPLEMENT, NOT SUPPLANT

Federal funds shall be used to supplement, not supplant, nonfederal funds expended to carry out career and technical education activities.

**Citation(s):** Perkins Sec. 311(a)

Compliance Criteria	Documents
<p><b>F01-1</b> In Compliance: Federal funds were not used to provide services which were provided with state or local funds in the prior year.</p> <p><b>F01-2</b> In Compliance: Federal Perkins funds were not used to provide services that are required under other federal, state, or local laws.</p> <p><b>F01-3</b> In Compliance: Federal Perkins funds did not replace state or local funds for a CTE activity that, in the absence of the federal funds, the district would have continued to use state or local funds to support.</p>	<p><b>Fiscal Agency Documents</b></p> <ul style="list-style-type: none"> <li>• Board policy prohibiting supplanting</li> </ul> <p><b>State Documents</b></p> <ul style="list-style-type: none"> <li>• Final Expenditure Reports for two previous years</li> <li>• Single Audit Report</li> </ul> <p><b>Onsite Evidence</b></p> <ul style="list-style-type: none"> <li>• Interview with business official</li> <li>• Interview with CTE administrator</li> </ul>

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**F02 PROCUREMENT**

Recipient maintains a written code of standards of conduct governing the performance of its employees engaged in the award or administration of contracts; and maintains records sufficient to detail the history of a procurement transaction; and procurement procedures provide for full and open competition to the extent practicable, and no contract is made with a vendor that has been suspended or debarred.

**Citation(s):** Perkins Sec. 122(c)(12), Uniform Guidance (UG) 2 CFR Part 200.112, 200.212,200.317-200.326, EDGAR 75.524 & 75.525

Compliance Criteria	Documents
<p><b>F02-1</b> In Compliance: Board policy prohibits direct financial benefit to any employee or affiliate.</p> <p><b>F02-2</b> In Compliance: Board policy prohibits participating by any employee, officer, or agent in the selection, or in the award of, any contracted supported by federal if a conflict of interest, real or apparent, is involved.</p> <p><b>F02-3</b> In Compliance: Records provide sufficient detail to determine proper procurement procedures were followed and costs were allowable.</p> <p><b>F02-4</b> In Compliance: Procurement policy and/or procedures differentiate between items that require a competitive bid and those that do not cost more than the threshold (i.e., small purchases).</p> <p><b>F02-5</b> In Compliance: Purchasing procedures ensure full and open competition, to the extent practicable.</p> <p><b>F02-6</b> In Compliance: Procurement procedures ensure that no contract is made to a suspended or debarred vendor.</p>	<p><b>Fiscal Agency Documents</b></p> <ul style="list-style-type: none"> <li>• Board Policy: Conflict of Interest</li> <li>• Procurement /purchasing policies and procedure</li> </ul> <p><b>State Documents</b></p> <ul style="list-style-type: none"> <li>• Final Expenditure Reports for two previous years</li> <li>• Single Audit Report</li> <li>• MDE Competitive Bid Threshold Memo</li> </ul> <p><b>Onsite Evidence</b></p> <ul style="list-style-type: none"> <li>• Interview with business official</li> <li>• Interview with CTE administrator</li> <li>• Evidence that the <a href="http://www.sam.gov">System for Award Management</a> (www.sam.gov) was checked.</li> <li>• Vendor list detailing status and date SAM was checked.</li> </ul>

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**F03 EXPENDITURE REVIEW**

Fiscal control and fund accounting policies and procedures ensure proper expenditure of and accounting for federal and nonfederal funds expended for career and technical education.

**Citation(s):** Perkins Sec. 135, Sec. 311(a), EDGAR 75.702, UG CFR 200.302, 200.303, & 200.305

Compliance Criteria	Documents
<p><b>F03-1</b> In Compliance: Federal grant expenditures were made according to the approved budget</p> <p><b>F03-2</b> In Compliance: Federal grant expenditures occurred within the grant period.</p> <p><b>F03-3</b> In Compliance: The accounting records and supporting documentation demonstrate how the federal funds were spent.</p> <p><b>F03-4</b> In Compliance: The accounting records are sufficient to determine that federal expenditures were allowable.</p> <p><b>F03-5</b> In Compliance: Only nonfederal funds were spent on required activities and the supporting documentation discloses how and when they were spent to accomplish the activity (if applicable).</p> <p><b>F03-6</b> In Compliance: The fiscal agency has procedures to monitor expenditures and reimbursement requests for all participating agencies (if applicable).</p> <p><b>F03-7</b> In Compliance: The fiscal agency minimized the time between making disbursements and drawing down funds from CMS for reimbursement.</p> <p><b>F03-8</b> In Compliance: The fiscal agency has appropriately signed Cooperative Agreements for Designation of Fiscal Agency for all participating agencies.</p>	<p><b>Fiscal Agency Documents</b></p> <ul style="list-style-type: none"> <li>• Chart of Accounts (COA) (or equivalent) that defines accounting codes used in General Ledger (GL).</li> <li>• GL summary and transaction details (or equivalent) for <b>federal</b> CTE grant expenditures</li> <li>• Budget policies and procedures</li> <li>• Accounting policies and procedures</li> <li>• GL summary and transaction details (or equivalent) for <b>nonfederal</b> expenditures used to support required CTE Perkins grant activities</li> <li>• Process, procedures, and forms used to monitor reimbursements to participating agencies</li> </ul> <p><b>State Documents</b></p> <ul style="list-style-type: none"> <li>• Final expenditure reports (CMS &amp; MEGS+)</li> <li>• Single Audit Report</li> <li>• CMS reimbursement requests</li> </ul> <p><b>Onsite Evidence</b></p> <ul style="list-style-type: none"> <li>• Interview with business official</li> <li>• Interview with CTE administrator</li> <li>• Supporting documentation for selected sample.</li> <li>• Signed Cooperative Agreements for Designation of Fiscal Agency for ALL participating agencies generating CTE Perkins funds (fiscal agency only)</li> </ul>

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**F04 Compensation – Personal Services**

Employees whose salaries and benefits are paid in whole or in part with federal funds maintain time distribution and/or personnel activity reports (PARS) in accordance with:

**Citation(s):** EDGAR A-21, A-122, UG CFR 200.430

Compliance Criteria	Documents
<p><b>F04-1</b> In Compliance: Employees paid 100% with CTE Perkins funds work solely on allowable career and technical education activities and certify to such at least twice a year.</p> <p><b>F04-2</b> In Compliance: Employees whose salaries and benefits are paid in part with CTE Perkins funds maintain appropriate time distribution records and/or personnel activity reports.</p> <p><b>F04-3</b> In Compliance: Salary and benefits paid were reconciled to budgeted amounts at least on a quarterly basis.</p> <p><b>F04-4</b> In Compliance: Salaries and benefits reported on the Final Expenditure Report agree with the district's general ledger payroll accounts.</p>	<p><b>Fiscal Agency Documents</b></p> <ul style="list-style-type: none"> <li>• List of employees and titles whose salary and benefits were paid in whole or in part with CTE Perkins funds</li> <li>• Payroll ledger</li> <li>• Policy and procedures complying with federal time and effort reporting requirements</li> <li>• GL payroll ledger accounts</li> </ul> <p><b>State Documents</b></p> <ul style="list-style-type: none"> <li>• Final Expenditure Reports for two previous years</li> </ul> <p><b>Onsite Evidence</b></p> <ul style="list-style-type: none"> <li>• Interview with business official</li> <li>• Interview with CTE administrator or Perkins Grant Coordinator</li> <li>• Semi-annual certifications (100%)</li> <li>• Reconciliation of actual payroll costs to budgeted amounts</li> <li>• Personnel Activity Reports for split-funded personnel</li> </ul>

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**F05 INVENTORY/ PROPERTY MANAGEMENT**

Prior written approval is required for purchasing equipment for state-approved career and technical education programs. Recipient's inventory management system meets the requirements in EDGAR. Equipment is defined as tangible, nonexpendable property having a useful life of more than one year and an acquisition cost of \$5,000 or more per unit.

**Citation(s):** Perkins Sec. 135, EDGAR 76.618, UG CFR 200.20,200.33, 200.58, 200.62, 200.94, 200.302(b)(4), 200.313, 200.453,

Compliance Criteria	Documents
<p><b>F05-1</b> In Compliance: Written approval was obtained from MDE/OCTE before instructional equipment was purchased.</p> <p><b>F05-2</b> In Compliance: Equipment purchased with CTE Perkins funds was entered and tracked on the recipient's equipment inventory.</p> <p><b>F05-3</b> In Compliance: Board policies and procedures regarding equipment purchases include measures to safeguard the equipment.</p> <p><b>F05-4</b> In Compliance: Board policy and procedures regarding Tangible Personal Property include measures to safeguard such items prone to theft or loss.</p> <p><b>F05-5</b> In Compliance: Inventory Management System properly tracks non-consumable Tangible Personal Property which may be prone to theft or loss and demonstrates an allocable benefit to the program.</p>	<p><b>Fiscal Agency Documents</b></p> <ul style="list-style-type: none"> <li>• Equipment inventory</li> <li>• Board policy for capital outlay purchases (if not submitted for F02)</li> <li>• Tangible Personal Property policies and procedures (if not submitted in F02)</li> <li>• Tangible Personal Property Inventory Management System documentation</li> </ul> <p><b>State Documents</b></p> <ul style="list-style-type: none"> <li>• MEGS+ Capital Outlay - Approved CTE Instructional Expenditures</li> </ul> <p><b>Onsite Evidence</b></p> <ul style="list-style-type: none"> <li>• Interview with business official</li> <li>• Interview with CTE administrator</li> <li>• Accounting records for instructional equipment purchases</li> </ul>

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### F06 PREVIOUS MONITORING REVIEW

All noncompliance findings from the previous TRAC monitoring review have been successfully resolved.

Compliance Criteria	Documents
<b>F06-1</b> In Compliance: The previous monitoring report contained financial noncompliance findings that were addressed in the approved compliance plan. The current financial review shows the previous noncompliance findings have been corrected and are not repeat findings.	<b>State Documents</b> <ul style="list-style-type: none"><li>• Prior monitoring report</li><li>• Prior compliance plan</li></ul>