


**AUTHORIZE THE COMMENCEMENT OF THE PUBLIC COMMENT PERIOD FOR GRANT
ADMINISTRATION POLICY STARTING JULY 28, 2023**

THE CHIEF EXECUTIVE OFFICER RECOMMENDS:

That the Board authorize the commencement of the Public Comment Period from July 28, 2023 to August 28, 2023 for the Policy described in the disposition table below. Pursuant to Board Rule 2-6(c), the Board must authorize the commencement of the Public Comment Period.

Current Policy Section/ Current Policy Title	New Policy Section/ New Policy Title	Description of Revision/Disposition
403.8 Grant Administration	N/A	Amend Policy 403.8 This policy is being revised to update the procedures being followed and to eliminate sections that are already covered in current Board Rules. In addition, new wording is being added to address equity in grant administration.

Approved as to Legal Form: 

DocuSigned by:

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Ruchi Verma
 General Counsel

Approved:

DocuSigned by:

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Pedro Martinez
 Chief Executive Officer

Policy Summary Form

Policy Being Amended	Policy Manager(s)
403.8_06-0426-PO3 Grant Administration	James Patrick Alforque
Link(s) to Current Policy (if applicable)	Link to Draft of Policy (Title should include “Rescind and Adopt New”, “Amend”, or “Adopt New” based on what action you are taking)
https://www.cps.edu/sites/cps-policy-rules/policies/400/403/403-8/	https://docs.google.com/document/d/1W98oQMwswqLUYQLKclz6REw-jWa5xnztjl-_hQk_8-0/edit

1. Why is this policy being amended on your current timeline? If you are amending multiple policies, please list out the reasons for each one (e.g., state legislation, compliance change, policy was out of date, annual policy review, CEO/CEdO recommendation, etc.)

This policy is being revised to update the references to department names and board rules and to add wording for equity.

2. Please give a high level summary of what policy changes are being made, and why.

Wording was updated to more accurately describe the handling of indirect costs and to note that gifts and donations are not subject to the requirements of this policy. Excess cash should be reported per Board Rule 7-13 (added since the original version of this policy was written).

3. Please provide any notable feedback from internal or external stakeholders, and how you addressed it or planned to address it in your policy draft.

We met with the Director of the Budget and Management Office and the Manager of Grant Accounting and they provided their feedback and verified the accuracy of the revisions.

4. Please provide any additional notes/considerations in the box below.

**AMEND BOARD REPORT 06-0426-PO3
GRANT ADMINISTRATION POLICY**

THE CHIEF EXECUTIVE OFFICER RECOMMENDS:

That the Chicago Board of Education (“Board”) amend the Grant Administration Policy Section 403.8 Board Report 06-0426-PO3.

PURPOSE: The purpose of this policy is to establish grant administration requirements to ensure compliance with funding agency requirements and to ensure the sound and cost-effective management of all Grants received by the Board. The administration of grants should be equitable to all impacted parties while operationalizing the CPS Equity Framework and aligning with the CPS mission.

POLICY TEXT:

I. Indirect Cost Reimbursement

All Board grant applications shall include a request for reimbursement of appropriate indirect costs using the rate table established by the Illinois State Board of Education, ~~and posted on the CPS Division of Revenue’s website.~~

Indirect costs are actual costs and expenses incurred by the Board in support of grant activities but which cannot be directly charged to a grant. Indirect costs may include but are not limited to: the costs of using the buildings and equipment; project accounting; personnel; computing; purchasing expense; postage; printing and duplicating expense; library services; and administration. The following costs may not be included in an indirect cost calculation budget, application or expenditure claim: capital; sub-contracted expenditures; fundraising; public relations; advertising bad debts; entertainment; grant expenditures or indirect costs used included on a claim for another grant; or fines & penalties, and such other expenses identified in the grant application as unallowable. A systematic methodology should be used to distribute indirect costs to programs or functions in order to approximate their full cost.

~~When personnel or administration-related indirect expenses are identified for reimbursement in a grant, staff will be notified at the beginning of a grant period as to the percentage of their workday being allotted for grant project services by the CPS grant administrator.~~

Funds received from private organizations and individuals ~~that meet all of the following criteria~~ will be deemed a gift or donation ~~and are not~~ subject to the requirements of this Policy: ~~(a) funds that provide general or unrestricted support for broadly defined activities in one or more program areas; (b) funds where no detailed fiscal, technical or narrative reports are required; (c) funds where no copyrights or other intellectual property rights resulting from the funds are claimed by the donor; and (d) funds with no time limit on the expenditure of funds and the grant is irrevocable.~~

Grants and grant agreements that do not permit indirect cost reimbursement or otherwise require the Board to absorb indirect costs under a cost-sharing arrangement must be approved by the Chief Financial Officer or his or her designee, prior to the submittal of the grant proposal or application. The Chief Financial Officer or his or her designee may authorize waivers to this Policy requirement if submitted prior to the submittal of the grant proposal or application if such waiver is deemed to be in the best interest of the Board.

II. Cost Sharing

Grants that require cost sharing commitments must be authorized by the Chief Financial Officer or his or her designee, prior to the submittal of the grant proposal or application. If approved by the Chief Financial Officer or his or her designee, the cost sharing proposal shall then be submitted to the funding source with a schedule detailing the specific Board resources be used to meet the cost sharing obligations. Expenses identified for cost sharing purposes must be incurred during the specified grant period and may not also be identified for purposes of indirect cost reimbursement. Salary dollars in excess of regulatory salary caps may not be cost shared. ~~The department or unit receiving~~ The Office of Finance, in collaboration with the department or unit receiving the grant shall document all expenses identified for cost sharing purposes for reporting to the funding source simultaneously with all grant expenditure reports.

III. Excess Cash

Grant funds shall be expended in accordance with the payment and vouchering schedules identified in the grant so as to ensure excess cash balances will not occur. All Board grant applications and proposed grant payment schedules shall be submitted based on actual cash needs and the spending plan for a specified grant period. The Chief Financial Officer or his or her designee will periodically review grant payment schedules to prevent and rectify excess cash occurrences. Any excess cash that needs to be refunded will be reported to the Board per Board Rule 7-13.

IV. Implementation

The Chief Financial Officer may issue guidelines and procedures to effectuate this policy.

Legal References: 30 ILCS 705/10