



Mandated Activities Project Guidelines and Roles and Responsibilities



Office of Special Education

September 2013

CONTENTS

Overview	Page 2
Application and Funding	Page 3
Budget Development	Page 4
Fiscal Standards	Page 8
Other Requirements.....	Page 10
Roles and Responsibilities.....	Page 11

OVERVIEW

The Individuals with Disabilities Education Act (IDEA) allocates funds under Part B for students with disabilities 3 through 21 years old. A majority of the funds, approximately 90 percent, are disseminated to school districts for programs and services for children and youth with disabilities under Part B. A percentage of the total grant award is used for state level administrative activities and special initiatives to address statewide and federal priorities. These initiatives are referred to as IDEA Mandated Activities Projects (MAPs).

APPLICATION AND FUNDING

Application Process:

Every project must complete and submit an application by October 1 of every fiscal year and be approved for the new year's funds. Applications are reviewed for project need (required or authorized activity and general supervision support), goals, anticipated outcomes, and parent involvement in connection with anticipated expenditures and a budget narrative. Application approval is contingent upon a recommendation for approval from the Office of Special Education (OSE), Program Finance Unit. Grant application concerns are resolved by the OSE Program Finance Unit in collaboration with the project director. Grant applications, including Project Blueprints, and any required or necessary supporting documentation is submitted to the Michigan Department of Education (MDE), OSE through the Michigan Electronic Grants System *Plus* (MEGS+). MEGS+ can be accessed through the MDE website or by entering the URL as noted below.

www.Michigan.gov/MDE

Click: Grants

Click: Michigan Electronic Grants System (MEGS)

or

<https://mdoe.state.mi.us/megsplus>

Amendments:

An amendment is a report of a programmatic or financial change. An amendment must be submitted if the project goals, activities, outcomes, budget or budget narrative have changed from the currently approved application. Project budgets and/or budget narratives should be amended if the project goals, activities or outcomes have caused the budget narrative or budget line items to change more than ten percent. In some cases budget amendments may only be needed to adjust anticipated expenditures to real costs.

Report Requirements:

The MAPs are required to submit reports twice a year through MEGS+; an interim report with an interim expenditure report (April 30) and a final report with a year-end expenditure report (November 29). The year-end reports are due 60 days after closing of the fiscal year or the completion or termination of the project. The Final Expenditure Report (FER) (year-end expenditure report) is submitted to the Michigan Department of Education through the Cash Management System (CMS). The OSE may request reports more frequently if deemed necessary.

Continuation of Project/Funding

On an on-going basis, the OSE reviews project efforts and recommends levels of MAPs funding to the State Superintendent. Mid-year and end-of-year reports, that are required of all MAPs, are reviewed for adherence to project goals, outcomes, anticipated budget and evidence of progress toward implementation of key activities. MAPs performance and overall need for the project are key factors in determining continued funding.

BUDGET DEVELOPMENT

All projects must submit a budget and budget narrative as part of the yearly application in MEGS+. While the budget is entered into the MEGS+, the budget narrative is submitted as an attachment, through MEGS+, on a template provided by the OSE. The MEGS+ budget and associated narrative detail project costs. The MEGS+ budget will include staff salaries along with the full-time equivalency (FTE), fringe benefits, purchased services, supplies and materials, capital outlay, other expenses and indirect costs. The budget narrative template will include additional budget detail such as individual staff FTE and duties, detailed contract information and out-of-state travel requests. The budget narrative template provides more detailed instruction to ensure MAPs are reporting the required information. It is expected that project directors will work with fiscal agent staff in the development and adhering to project budgets and appropriate expenditures.

The grant recipient is the fiscal agent. The fiscal agent is responsible for establishing and maintaining fiscal control and adhering to the code of Federal Regulations and accounting procedures as defined in the Michigan General Accounting Manual.

Salary and Benefits (Personnel):

All personnel (FTE) paid for with grant funds should be accounted for within the grant budget. It is expected that, at minimum, the "key" staff of the grant are listed individually with name, title and actual FTE noted. Key staff could be considered project directors, assistant or associate directors, or business managers. It is acceptable for administrative and/or support staff to be accounted for in one budget line as long as the amount of FTE and associated salary and benefits are accounted for. It is at the discretion of the project director and fiscal agent business manager to determine which model will work best for fiscal accountability.

Staff qualifications and compensation should be commensurate with the work assignments and the level of required leadership. Non-special education personnel may be funded when the grant's project goals and outcomes include general education involvement or a particular professional expertise outside of the area of special education.

Fiscal agents other than school districts must have proof of a personnel accountability system and a policy governing personnel employed with grant funds. The accountability system must include a description of personnel policies governing leave time, workday and other appropriate employee regulations.

Personnel Activity Reports (PARs) or semi-annual certifications are required to document time and effort and to verify staff's Full Time Equivalency (FTE) on the project. For staff who work solely on MAP activities semi-annual certifications are required to be collected and on file. For FTE where positions and activities are split funded between the MAP and another activity at the employing organization, PARs are required to be completed and on file. Staff that are employed under purchased services (independent contractors) need not complete either a semi-annual certification or PAR. If you are unclear as to which documentation needs to be on file

for staff employed on your grant please contact the OSE Program Finance grant manager.

Purchased (or Contracted) Services:

A purchased service could be anything that a MAP issues a purchase order for or receives an invoice for or an individual or organization who a MAP enters into a contract with. The MAPs may find it necessary to contract with businesses, organizations or individuals in order to complete necessary activities within the grant. MAPs Project Directors must ensure that any vendor providing goods or services to the project is not on the Excluded Parties List System (Debarment List) located at: www.epls.gov.

The following typical budgeted items should be accounted for under purchased services in the MAPs budgets:

Contracts

All contracts should be accounted for under purchased services in the MAPs budget within MEGS+. Contracts that the MAPs enter into that will help to support activities of the project must be documented in the budget narrative. In addition, a brief description of the activities within the contract should be included in the budget narrative to demonstrate how the activities listed in the contract link back to approved grant activities.

Travel

All staff travel should be budgeted under purchased services but broken out into in-state and out-of-state travel. Staff traveling in-state for the purpose of attendance at meetings, in-services, or workshops is approvable, when it can be demonstrated that it is reasonable and necessary and that participation is directly related to the activities, goals or outcomes of the project. In-state travel need only be documented within the MEGS+ budget. Criteria for determining in-state travel should focus on whether the:

- Project staff providing technical assistance to project participants is specified by project goals, outcomes or key activities.
- Project staff conducting seminars, workshops or providing a project demonstration as specified by project goals, outcomes and activities.
- Project staff person(s) needing the skills to meet project goals, outcomes or to complete project key activities.

Staff traveling out-of-state for the purposes of presenting or participation in meetings, in-services, or workshops is approvable, when it can be demonstrated that the requested travel is reasonable, necessary and that participation is directly related to the activities, goals or outcomes of the project. All out-of-state travel must be documented within the MEGS+ budget with additional detail regarding the purpose and need for the travel included in the budget narrative.

All out-of-state travel, as outlined in the MAPs budget narrative, is considered approved if the submitted application is approved by OSE without question or clarification needed about the purpose or need for the travel. Any out-of-state travel not included as part of the original application requires prior approval by the OSE. A written statement of rationale is required, including an estimate of expenditures and

dates of departure and return. Criteria for determining out-of-state travel should focus on whether the:

- The project staff person is scheduled to provide a demonstration/presentation at an out-of-state conference or workshop.
- The project staff person needs the training program. This particular training cannot be obtained in state, or can be obtained more economically out-of-state.
- The acquired skills are necessary to meet project outcomes.
- Professional development activities provided at seminars, conferences, and workshops are critical and necessary for project outcomes.

Reimbursement rates and expenses for travel, meals, etc. will follow the school district's policy for reimbursement rates. Agencies or organizations should use the reimbursement policy of the Michigan Department of Education (MDE).

Telephone

If telephone charges are specifically tied to your project outcomes, it should be part of your project's direct costs, or an above the line expenditure. Other telephone charges should be included in your administrative costs, or considered a below the line expenditure.

Rent

Rent may be charged to the grant and is considered an administrative cost. School districts who are the fiscal agents usually provide space at net cost or contribute office space as an in-kind contribution. If a school district identifies space in a building it does not own, rent may be charged to the grant. Non-profit and for profit organizations may rent space to operate the grant. If this space is also used for non-grant related activities, rent charged to the grant should be pro-rated. Rent charged to the grant should not exceed the average cost of rented office space in the geographical area where the project is located.

Stipends and Fees

Stipends, fees (or honorariums) for guest speakers and experts to assist with the project may be charged to the grant when their expertise or participation directly links to approved grant activities. Compensation should be reasonable and reflective of the individual's qualifications and should commensurate with the work assignments and the level of required participation.

Stipends for any grant reading affiliated with the project is not an allowable expenditure. Meals and travel expenses for grant readers are reimbursable at the Intermediate School District or state rate.

Audit

All federal grant projects must be audited in accordance with the MDE's Single Audit Requirements and Guidelines. It is incumbent upon the project to maintain records of costs and expenses, and to develop an employee accountability system consistent with these accounting requirements and standard accounting procedures. Audits are considered an administrative cost and should be documented as such within the MEGS+ budget.

The grantee will maintain a separate accounting of expenditures for this grant for each fiscal year it is awarded. Funds should only be requested as needed for reimbursement of expenditures and to meet immediate financial obligations. Funds should not be drawn for purposes other than those directly related to this grant. Generally Acceptable Accounting Principles (GAAP) will be used. The Agency's independent auditor will be made aware of the grant so that the auditor can review expenditures as required by federal single audit requirements. As indicated in the A-133 circular, projects are required to ensure that all auditors and monitors have access to all project records and financial statements. Current employees of the MDE may not be employed or contracted under the MAPs grants. Expenses charged to MAPs grants will not be charged to any other state or federal source and MAPs grants will not be used to supplant mandated state or local costs.

Supplies and Materials:

This includes consumable items and equipment under \$5,000 that are directly related to the operation and activities of the project. Equipment under \$5,000 could be defined as an article of nonexpendable, tangible personal property having a useful life of more than one year. This could include but not be limited to computers, audio visual and sound equipment, cellular phones, and furniture. While equipment valued under \$5,000 does not need to be approved through the capital outlay request process, it is expected that MAPs will provide anticipated yearly equipment needs and outline those needs within the budget narrative. Computers and equipment purchased that are considered tangible personal property having a useful life of more than one year must be tagged and tracked for project use.

Capital Outlay:

Equipment may be commonly referred to as capital outlay but in general includes non-consumable goods like equipment and furniture that is valued at \$5,000 or more. Prior approval from the OSE is required for all capital outlay expenditures. MAPs should complete the appropriate information within the MEGS+ system to request approval for capital outlay.

For equipment purchases in general, regardless of the value, MAPs should be certain to adhere to the most current Office of Management and Budget (OMB) circulars for appropriate document and equipment tracking requirements to ensure fiscal accountability. Any MAPs needing to dispose of equipment should contact the OSE Program Finance Unit to receive direction on current disposal procedures. At the closing of a grant, the grantee will be required to generate a complete list of all equipment purchased with grant funds. The OSE will review this list and determine which items, if any, must be returned.

Other Expenses:

Examples of other expenses could be anything not clearly mentioned above. An example of such could be:

Publications and Subscriptions

Publications and subscriptions that cannot be obtained at a library or shared with another project and are critical for the project's outcomes are an allowable cost.

FISCAL STANDARDS

All MAPs are held to the same fiscal standards and the following should always be referenced to determine if IDEA mandated activities costs are appropriate:

- Allowable
- Reasonable
- Allocable, and
- Adequately documented

In addition to the guidance provided in the MAPs Guidelines and Roles and Responsibilities document, MAPs should be sure to reference the following OMB Circulars for additional guidance:

- A-21, Educational Institutions
- A-87, State Local and Indian Tribal Governments (formerly 2 CFR 225)
- A-122, Non-Profit Organizations

Indirect Costs:

Indirect costs may be charged to the grant by both school districts and organizations. Specific indirect cost rates for school districts are determined yearly by the Office of Financial Management. The recipient, if a school district, must use its restricted federal indirect cost rate. Universities, Nonprofit and profit organizations are limited to an eight percent (8%) indirect rate. Since organizations and public agencies do not have special education program and service expenses, they are subject to another formula to determine an acceptable indirect cost rate. Operation and maintenance costs that are not directly charged to the grant make up the indirect cost pool. The special education federal restricted indirect cost rate is based on the ratio of direct costs to indirect costs.

Program Income:

It is allowable for MAPs to generate program income from activities such as conferences and trainings in order to off-set grant expenditures. Any program income generated as a result of MAPs activities must be credited back to the grant and used for other approved grant activities within the current fiscal year. In addition, any program income received by the project should be spent first to cover any project expenditures prior to requesting any funds from the Cash Management System (CMS). MAPs grants should be sure to document any anticipated and subsequently final program income on the MAPs budget narrative template and ensure that appropriate documentation for methods of collecting program income are on file.

Program Fiscal Reviews:

All of the IDEA MAPs are subject to program fiscal reviews that study the programmatic and fiscal aspects of the grant.

Cash Management System:

MAPs will request for reimbursement of grant activities through the MDE Cash Management System (CMS). The CMS system can be access at:

<https://mdoe.state.mi.us/cms/> or through the MDE website at www.Michigan.gov/MDE then clicking "Grants". Funds for grant activities may only be requested on a reimbursement basis. New grant projects may request a one-time 30-day cash advance when the grant application is submitted to MDE.

Grantees needing to gain access to the CMS should visit the CMS webpage and complete and submit the necessary documentation.

OTHER REQUIREMENTS

Workshops, Seminars, etc.:

MAPs should coordinate workshops, seminars, and conferences with other MAPs and MDE sponsored activities. MAPs grantees may be required to: present/attend Council for Exceptional Children (CEC) Conference, write for MDE or OSE publications, and present at other statewide conferences upon request. Some grantees will be required to provide data for the State Performance Plan (SPP)/Annual Performance Report (APR) upon request and may be asked to act as lead or co-lead in the development of the SPP/APR. Some expectations listed above may vary by project. This may include: dissemination at statewide conferences, SICC/SEAC presentations, written updates or reports and interacting with Stakeholder groups as needed.

Advisory Committees/Referent Groups:

Advisory committees/referent groups for IDEA MAPs contribute an expertise and perspective that assists the project in achieving its outcomes and activities. The IDEA MAPs project director should have on file the names and affiliations of advisory committee/referent group members and be able to provide the listed if requested by the OSE. The OSE may provide guidance to the project director regarding group membership.

The advisory committee/referent group expenses are limited to meals, mileage and lodging (when necessary). School districts, acting as fiscal agents, apply the mileage, meals, and lodging rate for their district. All others apply the state rates.

Accommodation Language:

The following statement has been reviewed and approved by the OSE as language that should be included on any letters, memorandums, or information sent out pertaining to meetings where the public is invited to attend:

"Persons with disabilities needing accommodations for effective participation in the meeting should contact _____, at (area code and phone number) ten calendar days in advance of the meeting to request mobility, visual, hearing, or any other form of assistance."

MDE Recognition:

All publications pertaining to the IDEA MAPs **must** be coordinated with the OSE, which includes but is not limited to:

- news releases
- reports
- films
- brochures
- videos, CDs, and DVDs

Project materials developed with MAPs grant funding from MDE **must** contain certain MDE branding information. The MAPs should refer to the "Style Guide Standards" document produced by the Center for Educational Networking. The document is accessible on the web at: www.cenmi.org.

ROLES & RESPONSIBILITIES OF IDEA MANDATED ACTIVITIES ADMINISTRATORS

Project Director (or Principle Investigator) – is the person responsible for completing the grant’s outcomes and activities. It is the responsibility of the Project Director to:

- Ensure the completion and submission of the Michigan Electronic Grant System *Plus* (MEGS+) IDEA Mandated Activities Application.
- Ensure the preparation and submission of the mid-year and end of year progress reports and updated budgets through the MEGS+. The OSE may request reports more frequently as deemed necessary.
- Ensure the submission, an amended MEGS+ application, as directed by the OSE, if strategies and data collected do not support the project’s goals.
- Annual review/update of the Project Blueprint so that it accurately reflects current activities and practices.
- Communicate with the OSE about the project’s progress, obstacles or concerns. Decisions to modify project goals, activities, outcomes, timelines, and budget should be coordinated with the OSE.
- Work with the OSE to maintain the project’s direction and to resolve concerns or conflicts.
- Receive approval from the OSE regarding the release of publications, including news releases, reports, films, brochures, videos, and other project materials developed with grant funds.
- Work with the fiscal agent to prepare the budget. The project director spends funds according to the approved budget and communicates any funding concerns to the fiscal agent as well as the OSE Program Finance grant manager.
- Ensure the grant funds are drawn and all narrative and financial reports are submitted to the Michigan Department of Education.
- Enforce the fiscal agent’s employee/personnel guidelines and policies for annual, sick, and personal leave, holidays, work hours, and other employment standards.
- Provide recommendations to the fiscal agent relative to the hiring and firing of personnel and notifies the OSE.
- Ensure the process for collecting data is followed, as described in the negotiated grant agreement for the project. Sign the negotiated grant agreement and implement the pertinent agreement sections along with the application’s goals and strategies.

Fiscal Agent – is the grant recipient and is primarily responsible for facilitating the funding mechanism. It is the responsibility of the Fiscal Agent to:

- Collaborate and partner with the OSE Program Finance grant manager, and project director to receive project funds, maintain fiscal accountability, and insure project outcomes and activities are implemented.
- Keep project director informed about status of funds and provide a financial report upon request.
- Sign-off on the negotiated grant agreement for the project and the final report.

- Establish employee/personnel guidelines including policies for annual, sick and personal leave, holidays, work hours, and other employment standards.
- Maintain employee benefits program and personnel records.
- Receive grant updates and reports from the project director, and support the project director in completing the outcomes and activities.
- Work with the project director regarding building lease arrangements (if pertinent).
- Work with the project director to prepare the budget, to draw funds based on previous and anticipated expenditures, prepare reports and immediately communicate funding concerns to the project director, OSE and specifically the OSE Program Finance grant manager.
- Subcontract with other agencies for personnel, if necessary. The agency with whom the fiscal agent contracts is responsible for establishing and maintaining employee/personnel guidelines including policy for annual, sick and personal leave, holidays, work hours and other employment standards.
- Carry liability insurance and other necessary business coverage, and is bonded. Potential liability elements of the grants will be identified in each negotiated grant agreement.
- Calculate the indirect rate according to the established indirect rate for that agency. If one or more subcontracts are established, it is the responsibility of the fiscal agent to negotiate with the contracting agencies regarding the indirect rate benefits.
- Know the business responsibilities according to the law and IRS rules.

OSE Assistant Director and Program Finance Grant Manager(s) –manage IDEA MAPs. MAPs have these personnel assigned to address programmatic concerns and fiscal matters.

The responsibilities of the OSE Assistant Director include:

- Review the grant application and sign off on the Application Review Checklist, if 100 percent approvable. If the application is not 100 percent approvable, the OSE Program Finance grant manager works with the project director to resolve issues.
- Oversee the grant, monitor the progress of the grant toward meeting the outcomes and activities, and the timelines. The OSE Program Finance grant manager, in conjunction with the OSE, holds the project director and fiscal agent accountable for meeting program outcomes and the expenditure of funds.
- Communicate regularly with the project director about the project’s progress.
- Know the project’s outcomes, activities, and impact on the targeted audience.
- If necessary, visit the project site, attend advisory group meetings and, when possible, other project training meetings or in-service sessions.
- Review mid-year and end-of-year written progress reports and budgets to confirm the project is in line with the outcomes, activities, and data collected.
- Work with the project director to problem solve, resolve concerns, conflicts, and maintain the direction of the project. If the outcomes and activities are not being met, the OSE Assistant Director may require a written action plan of correction from the project director.
- Inform the OSE of any grant concerns or when outcomes and activities are altered or changed.
- Ensure the OSE Program Finance receives a copy of the project’s publications for the grant file.

- Monitor project activity, maintain clear lines of communication, and maintain objectivity to avoid conflict of interest.
- Update the OSE Director and staff on IDEA Mandated Activities developments, successes, and other topics of interest.
- Coordinate the document and product approval review process within the MDE for all grantees.

The responsibilities of the OSE Program Finance grant manager include:

- Establish procedures for maintaining information pertaining to the IDEA Mandated Activities.
- Communicate with OSE regarding the IDEA Mandated Activities application approval status and budget information.
- Establish and update IDEA Mandated Activities allowable cost standards.
- Prepare IDEA Mandated Activities State Board and Superintendent items for approval.
- Provide all necessary information regarding fiscal agent responsibilities to the fiscal agents.
- Ensure the competitive bid process is followed.
- Provide information and technical assistance for project directors, fiscal agents, and OSE regarding allowable costs, accounting procedures, and program fiscal reviews.
- Resolve issues between grant recipients and the Michigan Department of Education's accounting unit relative to receiving funds.
- Review and approve, based on the recommendation of OSE the following: applications, all negotiated grant agreements, progress reports, budgets, amendments, and requests for capital outlay items.
- Notify fiscal agents and project directors before the end of the project period regarding their balance of funds to draw, to ensure funds are spent on a timely basis.
- Withhold grant funds based on the decision of the Director of the OSE.
- Develop a negotiated grant agreement process for IDEA Mandated Activities, when necessary.
- Initiate negotiated grant agreement meetings between the Michigan Department of Education, grant recipients, and fiscal agents.
- Approve the individualized negotiated grant agreements for each IDEA MAP, when necessary.
- Negotiate budget concerns between the OSE Program Finance grant manager(s), fiscal agent, and project director.
- Conduct program fiscal reviews of the IDEA MAPs that study the programmatic and fiscal aspects of the grant.

General Understandings

- Operation of the project is maintained in one of the following ways:
 - a. The project director operates the program and the fiscal agent implements the director's recommendations.
 - b. The grant recipient is the fiscal agent and the project director for the grant.

- It is understood:
 - a. grants are initiated at the Michigan Department of Education; and,
 - b. funds are federal set-aside funds used for meeting statewide needs. These needs are defined by a statewide needs assessment, focus groups, and the OSE priorities by law.
- The Michigan Department of Education, as grantor, accepts the personnel policies of the fiscal agent. The fiscal agent has the responsibility to provide the appropriate coverage for identified project staff.
- All parties participate in and agree to a negotiated grant agreement initiated by the OSE, when necessary. The OSE, project director, grant manager(s), and fiscal agent sign the negotiated grant agreement for each project.
- Attempts to resolve conflicts are first negotiated between the fiscal agent and project director. The project director informs the OSE Program Finance grant manager. If the conflict cannot be resolved between the fiscal agent and project director, then OSE negotiates the conflict. If the recommendation is to “terminate the grant” or change fiscal agents, the OSE notifies appropriate supervisory staff and proceeds to effect the change. Ultimate responsibility for the grant rests with the OSE.
- Project outcomes and activities are subject to revision based on the OSE SPP/APR and other reporting obligations.