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# **NEOLA POLICIES UPDATED JUNE 2021**

## **VOLUME 21, No. 2: EDGAR 2.0**

<b><u>POLICY</u></b>	<b><u>TITLE</u></b>
6114	Cost Principles – Spending Federal Funds
6325	Procurement – Federal Grants/Funds
7450	Property Inventory
7455	Accounting System for Capital Assets



Book	Policy Manual
Section	Vol. 21, No. 2 - EDGAR 2.0 - Feb. 2021
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### **REVISED POLICY - SPECIAL UPDATE - EDGAR 2.0 - NOV. 2020**

#### **6114 - COST PRINCIPLES - SPENDING FEDERAL FUNDS**

The Superintendent is responsible for the efficient and effective administration of grant funds through the application of sound management practices. Such funds shall be administered in a manner consistent with all applicable Federal, State and local laws, the associated agreements/assurances, program objectives, and the specific terms and conditions of the grant award.

#### **Cost Principles**

Except where otherwise authorized by statute, costs shall meet the following general criteria in order to be allowable under Federal awards:

- A. Be necessary and reasonable for proper and efficient performance and administration of the Federal award and be allocable thereto under these principles.

To determine whether a cost is reasonable, consideration shall be given to:

1. whether a cost is a type generally recognized as ordinary and necessary for the operation of the CCCCSA or the proper and efficient performance of the Federal award;
2. the restraints or requirements imposed by such factors as sound business practices, arm's length bargaining, Federal, State, local, tribal and other laws and regulations;
3. market prices for comparable goods or services for the geographic area;
4. whether the individuals concerned acted with prudence in the circumstances considering their responsibilities; and
5. whether the cost represents any significant deviation from the established practices or Board of Education policy which may unjustifiably increase the expense.

While Federal regulations do not provide specific descriptions of what satisfies the "necessary" element beyond its inclusion in the reasonableness analysis above, whether a cost is necessary is 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 CCCCSA can demonstrate that the cost addresses an existing need, and can prove it.

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

1. the cost is needed for the proper and efficient performance of the grant program;
2. the cost is identified in the approved budget or application;
3. there is an educational benefit associated with the cost;
4. the cost aligns with identified needs based on results and findings from a needs assessment;
5. the cost addresses program goals and objectives and is based on program data.



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 standard is met if the cost:

1. is incurred specifically for the Federal award;
  2. benefits both the Federal award and other work of the CCCCSA and can be distributed in proportions that may be approximated using reasonable methods; and
  3. is necessary to the overall operation of the CCCCSA and is assignable to the Federal award in accordance with cost principles mentioned here.
- B. Conform to any limitations or exclusions set forth ~~in these~~ cost principles in Part 200 or in the terms and conditions of the Federal award.
- C. Be consistent with policies and procedures that apply uniformly to both Federally-financed and other activities of the CCCCSA.
- D. Be ~~accorded~~~~afforded~~ 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 allocated to a Federal award~~assigned~~ as an indirect cost under another award.
- E. Be determined in accordance with generally accepted accounting principles.
- F. Be representative of actual cost, net of all applicable credits or offsets.
- The term "applicable credits" refers to those receipts or reductions 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 relating to the Federal award, they shall be credited to the Federal award, either as a cost reduction or a cash refund, as appropriate.
- G. Be not included as a match or cost-share, unless the specific Federal program authorizes Federal costs to be treated as such.
- H. Be adequately documented:
1. in the case of personal services, the Superintendent shall implement a system for CCCCSA personnel to account for time and efforts expended on grant funded programs to assure that only permissible personnel expenses are allocated;
  2. in the case of other costs, all receipts and other invoice materials shall be retained, along with any documentation identifying the need and purpose for such expenditure if not otherwise clear.
- I. Be incurred during the approved budget period.

The budget period means the time interval from the start date of a funded portion of an award to the end date of that funded portion during which recipients are authorized to carry out authorized work and expend the funds awarded, including any funds carried forward or other revisions pursuant to the law. Prior written approval from the Federal awarding agency or state pass-through entity may be required to carry forward unobligated balances to subsequent budget periods, unless waived.

### **Selected Items of Cost**

The CCCCSA shall follow the rules for selected items of cost at 2 C.F.R. Part 200, Subpart E when charging these specific expenditures to a Federal grant. When applicable, CCCCSA staff shall check costs against the selected items of cost requirements to ensure the cost is allowable. In addition, State, CCCCSA, and program-specific rules, including the terms and conditions of the award, may deem a cost as unallowable and CCCCSA personnel shall follow those rules as well.

### **Cost Compliance**

The Superintendent shall require that grant program funds are expended and are accounted for consistent with the requirements of the specific program and as identified in the grant application. Compliance monitoring includes accounting for direct or indirect costs and reporting them as permitted or required by each grant. Costs incurred for the same purpose in like circumstances shall be treated consistently as either direct or indirect costs, but may not be double charged or inconsistently charged as both.



### Determining Whether a Cost is Direct or Indirect:

- A. Direct costs are those 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.

These costs may include: salaries and fringe benefits of employees working directly on a grant-funded project; purchased services contracted for performance under the grant; travel of employees working directly on a grant-funded project; materials, supplies, and equipment purchased for use on a specific grant; program evaluation costs or other institutional service operations; and infrastructure costs directly attributable to the program (such as long distance telephone calls specific to the program, etc.).

- B. Indirect costs are those that have been incurred for a common or joint purpose benefitting more than one 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 shall be treated consistently as either direct or indirect costs.

These costs may include: general data processing, human resources, utility costs, maintenance, accounting, etc.

Federal education programs with supplement not supplant provisions must use a restricted indirect cost rate. In a restricted rate, indirect costs are limited to general management costs. General management costs do not include divisional administration that is limited to one component of the CCCCSA, the governing body of the CCCCSA, compensation of the Superintendent, compensation of the chief executive officer of any component of the CCCCSA, and operation of the immediate offices of these officers.

The salaries of administrative and clerical staff should normally be treated as indirect costs. Direct charging of these costs may be appropriate only if all of the following conditions are met:

1. Administrative or clerical services are integral to a project or activity.
2. Individuals involved can be specifically identified with the project or activity.
3. Such costs are explicitly included in the budget or have the prior written approval of the Federal awarding agency.
4. The costs are not also recovered as indirect costs.

Where a Federal program has a specific cap on the percentage of administrative costs that may be charged to a grant, that cap shall include all direct administrative charges as well as any recovered indirect charges.

Effort should be given to identify costs as direct costs whenever practical, but allocation of indirect costs may be used where not prohibited and where indirect cost allocation is approved ahead of time by the Florida Department of Education (FLDOE) or the pass-through entity (Federal funds subject to 2 C.F.R. Part 200 pertaining to determining indirect cost allocation).

### Timely Obligation of Funds

~~Financial obligations~~ are orders placed for property and services, contracts and subawards made, and similar transactions ~~during a given period~~ that require payment.

~~The term "financial obligations" is used when referencing a recipient's or subrecipient's use of funds under a Federal award by the non-Federal entity during the same or a future period.~~

The following table illustrates when funds are determined to be obligated under the U.S. Department of Education regulations:

If the obligation is for:

- A. Acquisition of property - on the date which the CCCCSA makes a binding written commitment to acquire the property.
- B. Personal services by an employee of the CCCCSA - when the services are performed.
- C. Personal services by a contractor who is not an employee of the CCCCSA - on the date which the CCCCSA makes a binding written commitment to obtain the services.
- D. Performance of work other than personal services - on the date when the CCCCSA makes a binding written commitment to obtain the work.



E. Public utility services - when the CCCCSA receives the services.

F. Travel - when the travel is taken.

G. Rental of property - when the CCCCSA uses the property.

H. A pre-agreement cost that was properly approved by the Secretary under the cost principles in 2 C.F.R. Part 200, Subpart E - Cost Principles - on the first day of the project period.

### Period of Performance

All financial obligations must occur during or between the beginning and ending dates of the grant project. This period of time is known as the period of performance. Period of performance means the total estimated time interval between the start of an initial Federal award when the CCCCSA is permitted to carry out the work authorized by the grant and the planned end date. The period of performance may include one or more funded portions or budget periods. The period of performance is dictated by statute and will be indicated in the grant award notification ("GAN"). As a general rule, State-administered Federal funds are available for obligation within the year that Congress appropriates the funds for. However, given the unique nature of educational institutions, for many Federal education grants, the period of performance is twenty-seven (27) months. This maximum period includes a fifteen (15) month period of initial availability, plus a twelve (12) month period for carryover. For direct grants, the period of performance is generally identified in the GAN.

In the case of a State-administered grant, financial obligations under a grant may not be made until the application is approved or is in substantially approvable form, grant funding period begins or all necessary materials are submitted to the granting agency, whichever is later. In the case of a direct grant, a grantee may use grant funds only for obligations it makes during the grant period, obligations may begin when the grant is approved, unless an agreement exists with the awarding agency or the pass-through entity (e.g., FLDOE) FLDOE or the pass-through entity to reimburse for pre-approval expenses.

For both State-administered and direct grants, regardless of the period of availability, the CCCCSA shall liquidate all financial obligations incurred under the award not later than ninety (90) days after the end of the funding period unless an extension is authorized. Any funds not obligated within the period of performance or liquidated within the appropriate timeframe are said to lapse and shall be returned to the awarding agency. Consequently, the CCCCSA shall closely monitor grant spending throughout the grant cycle.

2 C.F.R. 200.344(b)

2 C.F.R. 200.403

2 C.F.R. 200.404

2 C.F.R. 200.405

2 C.F.R. 200.406

2 C.F.R. 200.407

2 C.F.R. 200.413(a)-(c)

2 C.F.R. 200.430(a)

2 C.F.R. 200.431(a)

2 C.F.R. 200.458

2 C.F.R. 200.474(b)

34 C.F.R. 75.703

34 C.F.R. 76.707

34 C.F.R. 76.708(a)

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- Legal
- 2 C.F.R. 200.344(b)

2 C.F.R. 200.403

2 C.F.R. 200.404

2 C.F.R. 200.405

2 C.F.R. 200.406

2 C.F.R. 200.413(a)-(c)

2 C.F.R. 200.430(a)

2 C.F.R. 200.431(a)

2 C.F.R. 200.458

34 C.F.R. 75.703

34 C.F.R. 76.707

34 C.F.R. 76.708(a)

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Book Policy Manual

Section Vol. 21, No. 2 - EDGAR 2.0 - Feb. 2021

Title REVISED POLICY - SPECIAL UPDATE - EDGAR 2.0 - NOV. 2020 - PROCUREMENT - FEDERAL GRANTS/FUNDS

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Status

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**REVISED POLICY - SPECIAL UPDATE - EDGAR 2.0 - NOV. 2020****6325 - PROCUREMENT – FEDERAL GRANTS/FUNDS**

Procurement of all supplies, materials, equipment, and services paid for from Federal funds or CCCSA matching funds shall be made in accordance with all applicable Federal, State, and local statutes and/or regulations, the terms and conditions of the Federal grant, School Board policies, and administrative procedures.

The Superintendent shall ~~have and use~~ maintain a procurement and contract administration system in accordance with the USDOE requirements (2 C.F.R. 200.317-.326) for the administration and management of Federal grants and Federally-funded programs. The CCCSA shall maintain ~~oversight~~ contract administration system that requires contractors to perform in accordance with the terms, conditions, and specifications of their contracts or purchase orders. Except as otherwise noted, procurement transactions shall conform to the provisions of the CCCSA's documented general purchasing Policy 6320, AP 6320A, and AP 6325.

**[SELECT OPTION 1 OR OPTION 2]****☒ OPTION 1**

The CCCSA shall take affirmative steps to assure that small and minority businesses, women's business enterprises, and labor surplus area firms are used when possible in accordance with 2 C.F.R. 200.321.

**OR**

**☐ OPTION 2**

The CCCSA shall take affirmative steps to assure that small and minority businesses, women's business enterprises, and labor surplus area firms are used when possible. Such diversity outreach efforts shall include:

- A. placing qualified small and minority businesses and women's business enterprises on solicitation lists;
- B. assuring that small and minority businesses and women's business enterprises are solicited whenever they are potential sources;
- C. dividing total requirements, when economically feasible, into smaller tasks or quantities to permit maximum participation by small and minority businesses and women's business enterprises;
- D. establishing delivery schedules, where the requirements permits, which encourage participation by small and minority businesses and women's business enterprises;
- E. 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; and
- F. requiring the prime contractor, if subcontracts are to be let, to take the affirmative steps listed in paragraphs A through E of this section.

**[END OF OPTION]**



All CCCSA employees, officers, and agents who have purchasing authority shall abide by the standards of conduct covering conflicts of interest and governing the actions of its employees, officers, and agents engaged in the selection, award, and administration of contracts as established in Policy 1129, Policy 3129, and Policy 4129 – *Conflict of Interest*.

The CCCSA will avoid acquisition of unnecessary or duplicative items. Additionally, consideration shall be given to consolidating or breaking out procurements to obtain a more economical purchase. And, where appropriate, an analysis shall be made of lease 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.

To foster greater economy and efficiency, the CCCSA may enter into State and local intergovernmental agreements where appropriate for procurement or use of common or shared goods and services.

### **Competition**

All procurement transactions for the acquisition of property or services required under a Federal award paid for from Federal funds or CCCSA matching funds shall be conducted in a manner that encourages full and open competition and that is in accordance with good administrative practice and sound business judgment. In order to promote objective contractor performance and eliminate unfair competitive advantage, the CCCSA shall exclude any contractor that has developed or drafted specifications, requirements, statements of work, or invitations for bids or requests for proposals from competition for such procurements.

Some of the situations considered to be restrictive of competition include, but are not limited to, the following:

- A. unreasonable requirements on firms in order for them to qualify to do business
- B. unnecessary experience and excessive bonding requirements
- C. noncompetitive pricing practices between firms or between affiliated companies
- D. noncompetitive contracts to consultants that are on retainer contracts
- E. organizational conflicts of interest
- F. specification of only a "brand name" product instead of allowing for an "or equal" product to be offered and describing the performance or other relevant requirements of the procurement
- G. any arbitrary action in the procurement process

Further, the CCCSA does not use statutorily or administratively imposed State, local, or tribal geographical preferences in the evaluation of bids or proposals, unless (1) an applicable Federal statute expressly mandates or encourages a geographic preference; or (2) the CCCSA is contracting for architectural and engineering services, in which case 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.

To the extent that the CCCSA uses a pre-qualified list of persons, firms, or products to acquire goods and services that are subject to this policy, the pre-qualified list includes enough qualified sources as to ensure maximum open and free competition. The CCCSA allows vendors to apply for consideration to be placed on the list \_\_\_\_\_ at any time [insert frequency. see Drafting Note].

**[Drafting Note: The CCCSA shall allow vendors not on the pre-qualified list to apply for placement on the list periodically. The CCCSA may determine how frequently the pre-qualified list becomes open for new vendors or whether it is open continuously.]**

The CCCSA shall require 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 provide maximum open and free competition. The CCCSA shall not preclude potential bidders from qualifying during the solicitation period.

### **Solicitation Language (Purchasing Procedures)**

The CCCSA shall have written procurement procedures that require that all solicitations made pursuant to this policy incorporate a clear and accurate description of the technical requirements for the material, product, or service to be procured. Such description shall 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, shall set forth those minimum essential characteristics and standards to which it shall 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 shall be met by offers shall be clearly stated; and identify all requirements which the offerors shall fulfill and all other factors to be used in evaluating bids or proposals.

The Board will not approve any expenditure for an unauthorized purchase or contract.

## Procurement Methods

The CCCSA shall have and use documented procedures, consistent with the standards described above, for utilize the following methods of procurement:

### A. Informal Procurement Methods

When the value of the procurement for property or services under a Federal award does not exceed the simplified acquisition threshold, or a lower threshold established by the State, formal procurement methods are not required. The CCCSA may use informal procurement methods to expedite the completion of its transactions and minimize the associated administrative burden and cost. The informal methods used for procurement of property or services at or below the simplified acquisition threshold include:

#### 1. ~~[ ]~~ Micro-purchases

Procurement by micro-purchase is the acquisition of supplies or services, the aggregate dollar amount of which does not exceed \$ 5,000 (not to exceed \$10,000). To the maximum extent practicable, the CCCSA ~~should~~ shall distribute micro-purchases equitably among qualified suppliers. Micro-purchases may be made without soliciting competitive quotations if Superintendent considers the price to be reasonable based on research, experience, purchase history or other relevant information and documents are filed accordingly. The CCCSA shall maintain ~~The CCCSA maintains~~ evidence of this reasonableness in the records of all purchases made by this method.

[ ] Unless otherwise defined by State or local law, CCCSAs are responsible for determining and documenting an appropriate micro-purchase threshold based on internal controls, an evaluation of the risk, and its documented procurement procedures. The micro-purchase threshold used by the CCCSA shall be authorized or not prohibited under State, local, or tribal laws or regulations. A CCCSA which is qualified as a low-risk auditee for the most recent audit (C.F.R. 200.520) may increase the micro-purchase threshold up to \$50,000. An eligible CCCSA may self-certify the increased micro-purchase threshold on an annual basis after completing the annual internal institutional risk assessment to identify, mitigate, and manage financial risks. The self-certification, in accordance with 2 C.F.R. 200.334, must include a justification, clear identification of the threshold, and supporting documentation of the qualifications listed above. [DRAFTING NOTE: The Federal regulation allows for a \$50,000 threshold. While this authority is allowed for an entity qualified as a low-risk auditee, Neola does not suggest its use due to the complexity and subjectivity of the mechanism.]

#### 2. ~~[ ]~~ Small Purchases

~~Small purchase procedures provide for relatively simple and informal procurement methods for securing services, supplies, and other property that does not exceed the competitive bid~~ Small purchases include the acquisition of property or services, the aggregate dollar amount of which is higher than the micro-purchase threshold but does not exceed the simplified acquisition threshold of \$ 100,000 [not to exceed \$50,000]. Small purchase procedures require that price or rate quotations shall be obtained from ( x ) 3 ( ) an adequate number of qualified sources. [Drafting Note: ~~Unless the pass-through entity or State law defines the number of quotes required,~~ the CCCSA may define in policy how many quotations are adequate. The number must be greater than one (1).]

CCCSAs are responsible for determining an appropriate simplified acquisition threshold based on internal controls, an evaluation of risk, and its documented procurement procedures which must not exceed the threshold established in the Federal Acquisition Regulations (FAR). When applicable, a lower simplified acquisition threshold used by the non-Federal entity must be authorized or not prohibited under State, local, or tribal laws or regulations.

### B. Formal Procurement Methods

When the value of the procurement for property or services under a Federal award exceeds the simplified acquisition threshold, or a lower threshold established by the State, formal procurement methods are required. Formal procurement methods require following documented procedures. Formal procurement methods also require public advertising unless a non-competitive procurement method can be used in accordance with the



is not used as a selection factor, can only be used in procurement of A/E professional services. It cannot be used to purchase other types of services though A/E firms are a potential source to perform the proposed effort.

### 3. ~~[ ]~~ Noncompetitive Procurement Proposals

Procurement by noncompetitive proposals allows for solicitation of a proposal from only one source and may be used only when one or more of the following circumstances apply:

- a. micro-purchases
- b. the item is available only from a single source
- c. the public exigency or emergency for the requirement will not permit a delay resulting from publicizing a competitive solicitation
- d. the Federal awarding agency or pass-through entity expressly authorizes noncompetitive proposals in response to a written request from the CCCSA
- e. after solicitation of a number of sources, competition is determined to be inadequate

### Domestic Preference for Procurement

As appropriate and to the extent consistent with law, the CCCSA shall, to the extent practicable under a Federal award, provide a preference for the purchase, acquisition, or use of goods, products, or materials produced in the United States. Such requirements shall be included in all subawards including all contracts and purchase orders for work or products under the Federal award.

### **Contract/Price Analysis**

The CCCSA shall perform a cost or price analysis in connection with every procurement action in excess of [ ] \$250,000, [ ] \$ 5,000 including contract modifications. 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 CCCSA shall come to an independent estimate prior to receiving bids or proposals.

When performing a cost analysis, the CCCSA shall negotiate 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.

### **Time and Materials Contracts**

The CCCSA uses 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 CCCSA 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, the CCCSA sets a ceiling price for each contract that the contractor exceeds at its own risk. Further, the CCCSA shall assert a high degree of oversight in order to obtain reasonable assurance that the contractor is using efficient methods and effective cost controls.

### **Suspension and Debarment**

The CCCSA will award contracts only to responsible contractors possessing the ability to perform successfully under the terms and conditions of the proposed procurement. All purchasing decisions shall be made in the best interests of the CCCSA and shall seek to obtain the maximum value for each dollar expended. When making a purchasing decision, the CCCSA shall consider such factors as (1) contractor integrity; (2) compliance with public policy; (3) record of past performance; and (4) financial and technical resources.



standards on competition in 200.319 or non-competitive procurement. The formal methods of procurement are:

1. ~~[ ]~~ Sealed Bids

Sealed, competitive bids shall be obtained when the purchase of, and contract for, single items of supplies, materials, or equipment which amounts to more than [ ] \$50,000 [☒] \$ 100,000 and when the Board determines to build, repair, enlarge, improve, or demolish a school building/facility the cost of which will exceed \$ 100,000.

**[NOTE: The Board may set a threshold less than the \$50,000.00 established in State Board rule, however, the amount selected should be consistent with Policy 6320.]**

In order for sealed bidding to be feasible, the following conditions shall be present:

- a. a complete, adequate, and realistic specification or purchase description is available;
- b. two (2) or more responsible bidders are willing and able to compete effectively for the business; and
- c. 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.

When sealed bids are used, the following requirements apply:

- a. Bids shall be solicited in accordance with the provisions of State law and Policy 6320. Bids shall be solicited from ( ) (x) **an adequate number of** qualified suppliers, providing sufficient response time prior to the date set for the opening of bids. The invitation to bid shall be publicly advertised.
- b. The invitation for bids will include product/contract specifications and pertinent attachments and shall define the items and/or services required in order for the bidder to properly respond.
- c. All bids will be opened at the time and place prescribed in the invitation for bids; bids will be opened publicly.
- d. A firm fixed price contract award will be made in writing to the lowest responsible bidder. Where specified in bidding documents, factors such as discounts, transportation cost, and life cycle costs shall be considered in determining which bid is lowest. Payment discounts may only be used to determine the low bid when prior experience indicates that such discounts are usually taken.
- e. The Board reserves the right to reject any or all bids for sound documented reason.

2. ~~[ ]~~ Competitive Proposals

~~Procurement by competitive proposal, normally conducted with more than one source submitting an offer,~~  
is Procurement by proposals is a method in which either a fixed price or cost-reimbursement type contract is awarded.  
Proposals are generally used when conditions are not appropriate for the use of sealed bids or in the case of a recognized exception to the sealed bid method. [Drafting Note: Federal law does not require a competitive proposal unless the procurement is for over \$250,000. The State/CCCSA may set a lower threshold for sealed bids and competitive proposals. The Board may set a threshold less than the \$50,000.00 established in State Board rule. (see Policy 6320)]

If this method is used, the following requirements apply:

- a. Requests for proposals shall be publicized and identify all evaluation factors and their relative importance. Any response to the publicized requests for proposals shall be considered to the maximum extent practical.
- b. Proposals shall be solicited from an ( ) (x) **adequate number of** sources.
- c. The CCCSA shall use its written method for conducting technical evaluations of the proposals received and for selecting recipients.
- d. Contracts shall be awarded to the responsible firm whose proposal is most advantageous to the program, with price and other factors considered.

The CCCSA may use competitive proposal procedures for qualifications-based procurement of architectural/engineering (A/E) professional services whereby competitors' qualifications are evaluated and the most qualified competitor is selected, subject to negotiation of fair and reasonable compensation. The method, where price



The Superintendent shall have the authority to suspend or debar a person/corporation, for cause, from consideration or award of further contracts. The CCCSA is subject to and shall abide by the nonprocurement debarment and suspension regulations implementing Executive Orders 12549 and 12689, 2 C.F.R. Part 180.

Suspension is an action taken by the CCCSA that immediately prohibits a person from participating in covered transactions and transactions covered under the Federal Acquisition Regulation (48 C.F.R. chapter 1) for a temporary period, pending completion of an agency investigation and any judicial or administrative proceedings that may ensue. A person so excluded is suspended. (2 C.F.R. Part 180 Subpart G)

Debarment is an action taken by the Superintendent to exclude a person from participating in covered transactions and transactions covered under the Federal Acquisition Regulation (48 C.F.R. chapter 1). A person so excluded is debarred. (2 C.F.R. Part 180 Subpart H)

The CCCSA shall not subcontract with or award subgrants to any person or company who is debarred or suspended. For contracts over \$25,000, the CCCSA shall confirm that the vendor is not debarred or suspended by either checking the Federal government's System for Award Management, which maintains a list of such debarred or suspended vendors at [www.sam.gov](http://www.sam.gov); collecting a certification from the vendor; or adding a clause or condition to the covered transaction with that vendor. (2 C.F.R. Part 180 Subpart C)

### **Maintenance of Procurement Records**

The CCCSA ~~shall maintain~~ maintains 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, and the basis for the contract price (including a cost or price analysis).

2 C.F.R. 200.317-.326

Appendix II to Part 200

2 C.F.R. 200.520

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2 C.F.R. 200.317-.326

Appendix II to Part 200

2 C.F.R. 200.520

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Book	Policy Manual
Section	Vol. 21, No. 2 - EDGAR 2.0 - Feb. 2021
Title	REVISED POLICY - VOL. 21, NO. 2 - PROPERTY INVENTORY
Code	po7450 jc 4/21/21
Status	
Adopted	April 12, 2016
Last Revised	August 14, 2018

### **REVISED POLICY - VOL. 21, NO. 2**

#### **7450 - PROPERTY INVENTORY**

The School Board recognizes that efficient management and full replacement upon loss requires accurate inventory and properly maintained property records.

A complete inventory of all District-owned tangible personal property shall be conducted annually and submitted to the Board. A complete inventory shall also be conducted when there is a custodian change at a school or department location. A principal or department head shall obtain a police report for any District-owned tangible personal property that is found missing or stolen from the location's inventory.

For purposes of this policy "tangible personal property" shall mean any tangible personal property, of a nonconsumable nature, with a life expectancy of one (1) year or more which has a capitalized value equal to or greater than the value defined in statute.

The Director of Purchasing shall develop a property records manual that describes the processes necessary to implement the intent of this policy.

Equipment acquired under a Federal award will vest upon acquisition to the District, subject to the following conditions:

- A. The equipment shall be used for the authorized purposes of the award project during the period of performance or until the equipment is no longer needed for the purposes of the project.
- B. The equipment shall not be encumbered without the approval of the Federal awarding agency or the pass-through entity.
- C. The equipment may only be used and disposed of in accordance with the provisions of the Federal awarding agency or the pass-through entity and Policy 7310 and AP 7310.
- D. Property records shall be maintained that include a description of the equipment, a serial number or other identification number, the source of funding for the equipment (including the Federal Award Identification Number (FAIN)), title entity, acquisition date, cost of the equipment, percentage of Federal participation in the project costs for the award under which the equipment was acquired, the location, use, and condition of the equipment, and ultimate disposition data, including date of disposal and sale price of the equipment.
- E. A physical inventory of the property must be taken and results reconciled with property records at least once every two (2) years.
- F. A control system shall be developed to provide adequate safeguards to prevent loss, damage, or theft of the property. Any such loss, damage, or theft shall be investigated.
- G. Adequate maintenance procedures shall be implemented to keep the property in good condition.
- H. Proper sales procedures shall be established to ensure the highest possible return, in the event the Board is authorized or required to sell the equipment/property.
- I. When original or replacement equipment acquired under a Federal award is no longer needed for the original project/program or for activities currently or previously supported by a Federal awarding agency, and except as otherwise provided by Federal



statutes, regulations, or Federal awarding agency disposition instructions, the Board shall request disposition instructions from the Federal awarding agency if required by the terms and conditions of the Federal award. Disposition of the equipment shall be made in accordance with the provisions of C.F.R. 200.313.

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                                 F.S. 1001.43  
                                 2 C.F.R. 200.313

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Book Policy Manual

Section Vol. 21, No. 2 - EDGAR 2.0 - Feb. 2021

Title REVISED POLICY - VOL. 21, NO. 2 - ACCOUNTING SYSTEM FOR CAPITAL ASSETS

Code po7455 jc 4/21/21

Status

Adopted April 12, 2016

**REVISED POLICY - VOL. 21, NO. 2****7455 - ACCOUNTING SYSTEM FOR CAPITAL~~FIXED~~ ASSETS**

The School Board shall maintain a capital~~fixed~~-asset accounting system. The capital~~fixed~~-asset system shall maintain sufficient information to permit the following:

- A. ☒ the preparation of year-end financial statements in accordance with generally accepted accounting principles;
- B. ☐ ~~adequate insurance coverage;~~
- C. ☒ control and accountability.

Capital~~Fixed~~ assets are defined as those tangible assets of the District (including leased fixed assets) with a useful life in excess of one (1) year and an initial cost equal to or exceeding the amount defined in F.A.C. 69I-73.002.

Fixed assets shall be recorded at actual, or if not determinable, estimated purchase price or fair market value at the time of acquisition.

The Superintendent shall develop administrative procedures to ensure proper purchase, transfer, and disposal of capital~~fixed~~ assets.

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F.S. 1001.43  
F.A.C. 69I-73.002

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