

## **I. Policy Statement**

The Board of Education of Howard County encourages the attainment of external funding from federal, state, or private entities that are aligned with the values and key strategies of the Howard County Public School System (HCPSS). The Board, in its commitment to excellence in teaching and learning, advocates for the pursuit of outside funding in the form of grants to support existing programs which seek to enhance teaching and student learning or grants for research and development of new programs.

## **II. Purpose**

The purpose of this policy is to provide guidelines for seeking and administering grants.

## **III. Definitions**

Within the context of this policy, the following definitions apply:

- A. Data Privacy – The protection of student data from unauthorized data processing.
- B. Equipment – Any inventoried supporting material (physical, digital or otherwise) that is directly connected to the work of the grant.
- C. Grant – Non-repayable funds or goods given by a government agency, foundation, corporation, or other external source that requires a written proposal or other means of commitment for a particular purpose over a specific period of time.
  - 1. A grant can be newly awarded or provide continuous renewal of funding.
  - 2. A grant can be awarded based on a formula (statistical criteria with allocations for specific recipients) or awarded based on a competitive process to garner discretionary funds.
  - 3. Grant awards can be unrestricted or restricted for a program, school, or district. Awards can include funds, in-kind services, materials, and other means to benefit HCPSS directly.
- D. Grant Applicant – An individual authorized by HCPSS to prepare and submit a grant proposal, report on, or prepare materials in response to a Request for Proposal or other grant attainment requirement.
- E. Grant Manager – The school-based administrator, HCPSS Department of Education employee, or other identified staff responsible for managing the implementation of the

grant in compliance with the grant agreement and applicable federal, state and local laws.

- F. Indirect Costs – Expenses not readily identified with a particular grant, contract, project function or activity, but necessary for the general operation of the organization and the conduct of activities it performs. Indirect costs rates determine the proportion of each grant’s cost to the school or system.
- G. Memorandum of Understanding or Agreement – An agreement between two or more parties used to define rules of engagement.
- H. Program Manager – Person responsible for day-to-day operation of the grant, under the direction of the grant manager.
- I. Request for Proposal – An offer distributed by a funder that solicits a written proposal for funding or other resources.
- J. Student Data – Any personally identifiable information relating to an identified or identifiable student.

#### **IV. Standards**

- A. Board Notification and Approval of Grant Funds
  - 1. The Board will approve the following prior to the acceptance of funds:
    - a. Grant awards for amounts equal to or above \$100,000.
    - b. Grant awards that require the processing and/or sharing of HCPSS student data with an entity outside of the HCPSS, except for those that are required by state and federal regulations, per Policy 3060 Student Data Governance and Privacy.
  - 2. The Board will be provided with an annual grant summary report of all HCPSS grants.
- B. Superintendent/designee Requirements and Approval of Grant Funds
  - 1. The Superintendent/designee will approve all grant awards less than \$100,000.
  - 2. Per Maryland State Department of Education (MSDE) requirements, the Superintendent will sign all grant proposals to be submitted to the MSDE.
  - 3. The Superintendent will sign all grants that include the addition of a full-time equivalent position.

4. The Superintendent/designee will annually determine the rate for Federal Insurance Contributions Act (FICA) indirect costs (for grant proposals without restricted rates) upon approval by the Maryland State Department of Education. Other indirect costs will be determined by either the funder or the requirements of the project.

C. Grant Initiation, Monitoring, and Compliance

1. The grant applicant will submit an Intent to Submit a Grant Proposal form to the Superintendent/designee prior to completing a grant application for any amount.
2. Grant awards that utilize a memorandum of understanding or agreement with an outside entity for application, implementation, and/or fulfillment of grant will be reviewed by the Partnerships Office prior to the acceptance of funds.
3. The grant manager will complete all reports required by the grant and ensure that all awarded grants are accounted for and are used for legitimate education-related expenses solely for HCPSS students, teachers, and employees.
4. The principal will ensure that all grants awarded to the school are accounted for and are used for legitimate education-related purposes.
5. Through collaboration with the Superintendent/designee, the Offices of Accounting and Budget will support grant managers with financial performance matters and ensure compliant financial grant performance.
6. A record of all grants that are awarded to HCPSS will be kept by the Superintendent/designee.
7. The grant manager will keep comprehensive records for a minimum of five years from the grant award, including completed application, notices of grant award, documentation of receipt of funds, correspondence with funder, and financial reports related to any grant.
8. Disposal of any materials, equipment, or other supplies purchased with grant funds will comply with Policy 4080 Disposition of Surplus Equipment, unless otherwise specified by the provider of the grant.
9. Grants will comply with federal, state, and local student data and data privacy protections, including those provisions identified in the Annotated Code of Maryland, Education Article, §4-131, and HCPSS Policy 3060 Student Data Governance and Privacy.
10. The requirements for grants awarded with non-HCPSS entities (other school districts, government entities, nonprofits) or grants where HCPSS is designated as the subgrantee are in accordance with Section IV.

11. The provisions of this policy apply to all HCPSS grants. This policy does not extend to fundraisers or donations given to organizations such as Parent-Teacher Associations, booster clubs, school foundations, bargaining units, and independently chartered student organizations

## **V. Responsibilities**

- A. Grant applicants will complete the Intent to Submit a Grant Proposal form to the Superintendent/designee prior to applying for a grant for any award amount.
- B. Grant managers will complete all reports required by the grant and maintain comprehensive records for a minimum of five years.
- C. The Offices of Accounting and Budget will ensure compliant financial grant performance.
- D. Principals or designated school-based administrators will submit an annual report to the Superintendent/designee of all grants awarded to the school during the fiscal year.
- E. The Superintendent/designee will annually present a grant summary report for all grants received during the fiscal year to the Board.

## **VI. Delegation of Authority**

The Superintendent/designee is authorized to develop appropriate procedures to implement this policy.

## **VII. References**

- A. Legal  
Annotated Code of Maryland, Education Article, §4-131
- B. Other Board Policies  
Policy 3060 Student Data Governance and Privacy  
Policy 4010 Donations  
Policy 4020 Fund Raising  
Policy 4040 Fixed Assets  
Policy 4050 Procurement of Goods and/or Services  
Policy 4080 Disposition of Property  
Policy 6060 Community Improvements to School Sites or School Facilities  
Policy 10000 Student, Parent, Family and Community Engagement
- C. Relevant Data Sources
- D. Other  
Intent to Submit a Grant Proposal form

**VIII. History**

ADOPTED: June 14, 2001

REVIEWED:

MODIFIED:

REVISED: May 12, 2011

April 11, 2019

EFFECTIVE: July 1, 2019

Effective: January 12, 2023

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**I. Seeking Grant Funding**

- A. The Superintendent/designee will provide grant-seeking and related services to Howard County Public School System (HCPSS) employees by:
1. Identifying possible funding opportunities through outreach and involvement with community, philanthropic and business entities, and through relationships with federal, state, and local agencies.
  2. Identifying and facilitating grant funding opportunities through information gathered directly from needs assessments and meetings with employees.
  3. Providing resources for grant research and grant writing and training in the use of those resources to HCPSS employees.
- B. HCPSS employees who are seeking grant funds will follow these procedures:
1. Grant applicants are encouraged to collaborate with the Superintendent/designee to complete a grant application.
  2. Regardless of the grant award amount, grant applicants are required to complete the HCPSS Intent to Submit a Grant Proposal form and submit it to the Superintendent/designee.
  3. Grant managers must complete the grant management online training course prior to the submission of a grant application. The completion of the course only needs to occur annually.
  4. For grants over \$1,000, grant applicants will contact the Offices of Accounting and Budget for guidance on costs of the proposed project, including indirect costs, and obtaining any necessary accounting approvals. All personnel costs are to be paid at rates shown in the HCPSS approved budget.
  5. The Offices of Accounting and Budget will fiscally manage any grant that meets one or more of the following criteria:
    - a. Funding sources that include restricted funds and program financial reports.

- b. Grant requires cash, in-kind matching funds, or commitment of HCPSS resources.
    - c. Grant funds will be used for salaries, substitute teachers, or workshop wages.
    - d. Funding request is equal to or exceeds the amount requiring Board approval.
  6. The grant applicant and the Superintendent/designee may request letters of support from community organizations to be included in the grant proposal. Securing these letters is the responsibility of the grant applicant and must accompany the grant proposal. If a memorandum of understanding or similar agreement is needed, a review from the Partnerships Office will be requested.
  7. After all approvals have been obtained, the grant applicant, with guidance from the Superintendent/designee, will prepare the final grant proposal and submit the grant proposal to the funding source.
  8. If the grant proposal requests \$100,000 or more in funding, the grant applicant, with guidance from the Superintendent/designee and the Offices of Accounting and Budget, will prepare a Board report, requesting approval to accept grant funding. Prior to Board reports, using established administrative processes, the Superintendent/designee will periodically inform the Board about the external funds HCPSS is pursuing.
- C. If the grant proposal does not require Board approval, it will be included in an annual summary report of all grant awards presented to the Board as an Information Item by the Superintendent/designee.
- D. The provisions in Section I. also apply to all grants awarded with non-HCPSS entities (other school districts, government entities, nonprofits) or grants where HCPSS is designated as the subgrantee.

## **II. Receiving and Administering Grant Funds**

- A. Upon receiving grant funding, the grant manager assigned to a particular grant or grants will:
1. Manage the implementation of the grant(s) in compliance with applicable federal, state and local laws, as well as the terms of the Grant Agreement.
  2. Ensure that the tasks and terms set forth in the grant are completed in accordance with the approved budget and timeline.
  3. Ensure the quality and timeliness of products, reports, financial statements, and other materials to be delivered under the terms of the grant.

4. Coordinate with the Superintendent/designee and other HCPSS employees as appropriate for the completion of required evaluations, reports, billings, and audits.
- B. If the grant amount is over \$1,000, the grant manager will submit a copy of the notice of grant award along with a copy of the approved budget from the grant proposal to the Superintendent/designee and the Offices of Accounting and Budget so that an account can be created.
- C. All grant funds awarded to the HCPSS must be made payable to the HCPSS. The grant manager, in collaboration with the Offices of Accounting and Budget, is responsible for receiving grant funds, overseeing the project, accounting for grant funds, and ensuring that financial and program reports are completed and submitted to the funding source.
- D. All grant funds awarded to a school must be made payable to that school. The principal is responsible for receiving grant funds, overseeing the project, accounting for grant funds, and ensuring that financial and program reports are completed and submitted to the funding source. When grants to schools are over \$1,000, principals must collaborate with the Offices of Accounting and Budget.
- E. If a grant is for a group of schools, a grant manager, in collaboration with the Offices of Accounting and Budget, is responsible for overseeing the project, accounting for grant funds, and ensuring that financial and program reports are completed and submitted to the funding source.
- F. The grant manager will ensure that the terms of the grant are not changed without the written authorization of HCPSS and the funding source. The grant manager will inform the appropriate division management and work with the Superintendent/designee on any proposed fiscal and program changes.
- G. In cooperation with the Superintendent/designee, the grant manager will oversee the continuation of a multiyear project and the proper termination of a completed project by ensuring that grant funds are expended. Otherwise, the grant manager will seek written authorization from the funding source to extend the life of the grant.
- H. Grant awards may be subject to requirements in Policy 3060 Student Data Governance and Privacy, Policy 4010 Donations, Policy 4020 Fund Raising, Policy 4050 Procurement of Goods and/or Services, Policy 4080 Disposition of Property, and/or Policy 6060 Community Improvements to School Sites or School Facilities.
- I. The provisions in Section II. also apply to all grants awarded with non-HCPSS entities (other school districts, government entities, nonprofits) or grants where HCPSS is designated as the subgrantee.



### **III. Completion of Grants**

- A. The Superintendent/designee will monitor project spending during the life of a project and provide notice of termination to the grant manager.
- B. The Offices of Accounting and Budget will provide a final financial report to the funding source as required.
- C. The grant manager is responsible for completing any final project status reports and filing a copy with the Superintendent/designee.
- D. When a school monitors spending during the life of the grant, the principal is responsible for completing all final financial and project status reports.
- E. Principals are responsible for submitting an annual report of all grants received during the fiscal year to the Superintendent/designee.
- F. Unless otherwise specified, the tenure of all positions funded by grants is conditional upon continued grant funding. The grant manager will work with the Office of Human Resources to provide guidance to temporary and permanent HCPSS employees about their rights and responsibilities regarding employment with HCPSS upon termination of the grant.
- G. Any equipment purchased with grant funds are solely the property of HCPSS and must remain with the HCPSS school or facility original to the grant until the end of the lifecycle of the equipment. Once the equipment is determined to be obsolete, unsafe, outdated, or when the items no longer have significant use to the instructional or support programs of HCPSS, they will be collected from the site for data wiping, then sold, traded, destroyed, or disposed of by other means.
- H. The provisions in Section III. also apply to all grants awarded with non-HCPSS entities (other school districts, government entities, nonprofits) or grants where HCPSS is designated as the subgrantee.

### **IV. Monitoring**

Policy 4000 implementation procedures will be overseen by the Office of the Deputy Superintendent.

**V. History<sup>1</sup>**

ADOPTED: June 14, 2001  
REVIEWED: December 20, 2017  
MODIFIED: January 12, 2023  
REVISED: May 12, 2011  
          April 11, 2019  
EFFECTIVE: January 12, 2023

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<sup>1</sup> Key: *Adopted*-Original date the Board took action to approve a policy; *Reviewed*-The date the status of a policy was assessed by the Superintendent's Standing Policy Group; *Modified*-The date the Board took action to alter a policy that based on the recommendation of the Superintendent/designee did not require a comprehensive examination; *Revised*-The date the Board took action on a that policy based on the recommendation of the Superintendent/designee needed a comprehensive examination; *Effective*-The date a policy is implemented throughout the HCPSS, typically July 1 following Board action.