

Policy Outline

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I. Policy Value Statement

The Board of Education of Howard County (Board) encourages the attainment of external funding from federal, State, local, 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 equity and excellence in education, 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 aligned to the school system’s vision and mission.

II. Purpose

The purpose of this policy is to provide guidelines for the pursuit, acceptance, and management of grants.

III. 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, in accordance with Policy 3060 Student Data Governance and Privacy.

2. The Board will be provided each January with an annual grant summary report of all HCPSS grants for the prior fiscal year.

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 MSDE. Other indirect costs will be determined by either the funder or the requirements of the project.

C. Grant Management

1. All grant applicants 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 (MOU) as the official grant agreement with an outside entity for application, implementation, and/or fulfillment of grant will be reviewed 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 and employees.
4. For school-based grants, the principal will serve as the grant manager and will ensure that all grants awarded to the school are accounted for and are used for legitimate education-related purposes.
5. A record of all grants that are awarded to HCPSS will be kept by the Superintendent/designee.
6. The grant manager will keep comprehensive records 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 in accordance with Policy 3050 Records Management.
7. Grants will comply with federal, State, and local laws, regulations, and HCPSS policies. Specifically, the procurement of goods and services must be in accordance with Policy 4050 Procurement of Goods and/or Services.

8. Disposal of any materials, equipment, or other supplies purchased with grant funds will comply with Policy 4080 Disposition of Property, 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 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 III. of this policy.
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.
12. Any equipment, goods, or materials 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 its useful life, and then be disposed of in accordance with Policy 4080 Disposition of Property.

IV. Responsibilities

- A. Grant applicants will complete and submit the Intent to Submit a Grant Proposal form to the Superintendent/designee prior to applying for a grant for any award amount. The Superintendent/designee will provide authorization to move forward with the grant application submission.
- B. Grant managers will ensure completion of all reports required by the grant and maintain comprehensive records in accordance with Policy 3050 Records Management.
- C. Grant managers will ensure compliant financial grant performance with the support of staff and other departments.
- 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.
- F. The Superintendent/designee will provide central coordination to the grants management process. The Superintendent/designee will:

1. Collaborate with all grant managers and their teams to ensure compliant and effective administration of all grants to maximize grant funding opportunities.
2. Ensure all HCPSS employees are informed of appropriate grants management practices, including the provisions of this policy.

V. Delegation of Authority

The Superintendent/designee is authorized to develop appropriate procedures for the implementation of this policy within the limits set forth by the policy.

VI. Definitions

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

- A. Data Privacy – The protection of student data from unauthorized creation, collection, use, maintenance, disclosure, and/or destruction.
- B. Equipment – An item that is a moveable or fixed unit (furnishing, instrument, machine, apparatus) that typically has a life expectancy of more than one (1) year, and is better to repair than replace (unlike supplies/materials which are consumed).
- C. Grant – Non-repayable funds given by an 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. The spending of grant award funds is restricted to the specific purpose(s) and time period as determined by the grantor.
 4. A grant award is not a donation, gift, sponsorship, or fundraiser.
 5. Grants can be given by a government agency, foundation, corporation, or other external source. The giving organization is the “Grantor.”
 6. For purposes of this policy, the recipient of the funds (“the Grantee”) is HCPSS (or a school or program within HCPSS).
- D. Grant Applicant – A HCPSS employee authorized by the Superintendent/designee 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 HCPSS employee responsible for managing the implementation of the grant in compliance with the grant agreement and applicable federal, State and local laws and policies. The principal must serve as the grant manager for school-based awards.

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- F. HCPSS Employee – Any individual who is a permanent or temporary employee of the HCPSS whose compensation is paid in whole or part by the Board, including but not limited to, school-based administrators, teachers, substitute teachers, paraeducators, and other school-based and Central Office support staff.
 - G. Indirect Costs – Represent the expenses of doing business that are 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.
 - H. Memorandum of Understanding (MOU) or Agreement – An agreement between two or more parties used to define rules of engagement.
 - I. Program Manager – Person responsible for day-to-day operation of the grant, under the direction of the grant manager.
 - J. Request for Proposal – An offer distributed by a funder that solicits a written proposal for funding or other resources. (Not the same as a formal solicitation in the procurement process which invites quotes or bids.)
 - K. Student Data – Any personally identifiable information relating to an identified or identifiable student.
 - L. Supplies – Articles or materials that are consumed, expendable, and/or inexpensive. Supplies typically last for less than one year and are better to replace than repair.

VII. References

- A. Legal
 - Md. Ann. Code, Education Article, §4-131
 - Md. Ann. Code, Education Article, §5-105(d)
- B. Board Policies
 - Policy 3050 Records Management
 - 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 8040 Selection of Instructional Resources
 - Policy 10000 Student, Parent, Family and Community Engagement
- C. Relevant Data Sources

- D. Other
Intent to Submit a Grant Proposal Form

VIII. History¹

ADOPTED: June 14, 2001
REVIEWED: January 27, 2023
MODIFIED:
REVISED: May 12, 2011
April 11, 2019
December 12, 2024
EFFECTIVE: December 12, 2024

¹ 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 policy that 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.

Effective: December 12, 2024

- I. Identifying, Prescreening, and Applying for Grant Funding Opportunities**
- A. Identification: Howard County Public School System (HCPSS) employees interested in grant opportunities will:
1. Identify potential funding opportunities through outreach and involvement with community, philanthropic, and business entities, through relationships with federal, State, and local agencies, and through collaboration with the HCPSS Grants Office.
 2. Identify and facilitate grant funding opportunities through information gathered directly from needs assessments and meetings with stakeholders.
 3. Access resources and training provided by the HCPSS Grants Office for grant seeking research and grant writing.
- B. Prescreening: HCPSS employees who have identified a grant funding opportunity must follow these procedures to prescreen the opportunity and receive authorization from the HCPSS Grants Office prior to grant application submission:
1. Regardless of the potential grant award amount, HCPSS employees who intend to apply for a grant are required to complete the HCPSS Intent to Submit a Grant Proposal form and submit it to the Superintendent/designee.
 2. The HCPSS Grants Office will prescreen the grant funding opportunity, in collaboration with the Offices of Budget, Accounting, Human Resources, Procurement, and Data Privacy (as applicable), to ensure awareness, alignment, and feasibility of implementing the proposed grant activities.
- C. Application: Grant applicants must follow these procedures when preparing and submitting a grant application on behalf of HCPSS:
1. Grant applicants must complete the grant management online training course prior to the submission of a grant application. The completion of the course must occur at least annually for the lifetime of the grant.
 2. Grant applicants should collaborate with the HCPSS Grants Office to complete a grant application.

3. When developing the proposed grant budget, grant applicants will follow all guidance provided by the Offices of Grants, Accounting and Budget when calculating costs of the proposed project, including indirect costs and personnel costs (salaries, wages, health benefits, retirement, etc.).
4. For grants requiring HCPSS to pay matching or additional funds, grant applicants must consult with the HCPSS Budget Office to confirm availability and source of these additional funds, prior to submitting the grant application.
5. For grants proposing to fund any salaried position, grant applicants must consult with the Human Resources Classification and Compensation Team to determine the appropriate position classification, cost, and other specifications, prior to submitting the grant application.
6. For grants proposing to use a third party supplier for the provision of goods and/or services in the amount of \$10,000 or higher, grant applicants must consult with the Director of Procurement and Materials Management, prior to submitting the grant application, to determine the appropriate steps that must be followed in seeking a grant-related requisition.
7. For grants requiring the sharing of student-level information or images, and/or the collection of student-level data, grant applicants must ensure compliance with Policy 3060 Student Data Governance and Privacy.
8. For grants proposing to purchase any type of instructional resources (including curricula, assessments, textbooks, digital materials, and/or online subscriptions), grant applicants must consult with the Executive Director of Curriculum, Instruction, and Assessment, prior to submitting the grant application, to ensure the resources are in alignment with HCPSS Policy 8040 Selection of Instructional Resources.
9. For grants proposing to purchase any type of technological device or software (including laptops, desktop computers, projectors, printers, tablets, phones, online subscriptions, and/or software programs), grant applicants must consult with the Executive Director of Information Technology, prior to submitting the grant application, to ensure the device or software meets HCPSS required specifications.
10. 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.
11. If a partnership agreement is needed, a review from the Strategic Partnerships Office will be requested.

12. The HCPSS Grants Office, Budget Office, Chief Financial Officer, and the Superintendent/designee must review and approve a completed grant application package, including a detailed budget narrative, prior to the grant applicant submitting the package to the grantor organization.
 13. 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.
- D. The provisions in Section I. of these procedures 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 Managing Grant Funds

- A. Acceptance: When a grant is awarded, the grant manager will work collaboratively with the HCPSS Grants Office to gain approval to accept the award.
1. If the grant proposal requests \$100,000 or more in funding, or otherwise requires Board approval, the HCPSS Grants Office, with collaboration from the grant manager, will prepare a Board report, requesting approval to accept grant funding.
 2. If the grant award 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.
 3. Grant awards that utilize a Memorandum of Understanding (MOU) as the official grant agreement with an outside entity for implementation and/or fulfillment of grant must be reviewed by the following HCPSS offices prior to the setup or spending of grant funds:
 - a. Office of Accounting
 - b. Office of Budget
 - c. Office of Grants
 - d. Office of the General Counsel
 - e. Office of Purchasing (when a third party contract is referenced in the agreement)
 - f. Office of Safety, Environment, and Risk Management
- B. Award Setup: 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 HCPSS Grants Office. The Grants Office will then initiate account setup.

1. The Offices of Accounting and Budget will create a centrally managed account in Workday for any grant that meets one or more of the following criteria:
 - a. Funding sources that require Workday-based 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 wages of any type.
 - d. Funding request is equal to or exceeds \$10,000.
 2. For school-based grant awards that do not meet the criteria above, the school principal, with approval from the Grants Administrator, may create a new sub-account within the School Activity Fund (Section 300.0.00 for Grants) where the grant will be locally managed.
- C. Management: 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, the HCPSS Grants Office, and other HCPSS employees as appropriate for the completion of required evaluations, reports, billings, and audits.
 5. All grant funds awarded to the HCPSS must be made payable to the HCPSS. The grant manager, with support from the Offices of Grants, 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.
 6. No grant funds will be expended prior to the receipt of the official award notification and the fully executed official grant agreement.
 7. All grant funds awarded to a school must be made payable to that school. The school principal, with support from the principal's secretary (or bookkeeper for high school), and from the Offices of Grants, 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.

8. If a grant is for a group of schools, the designated grant manager, with support from the Offices of Grants, 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.
 9. 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 Offices of Grants, Accounting, and Budget to follow the prescribed amendment process to seek approval on any proposed fiscal and program changes.
 10. In cooperation with the Offices of Grants, Accounting, and Budget, 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.
 11. 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.
- D. The provisions in Section II. of these procedures 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. Grant managers should coordinate with the Offices of Grants, Accounting, and Budget as well as other HCPSS employees as appropriate, for completion of interim and final reports, including final financial reports 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 school principal is responsible for completing all final financial and project status reports.
- E. School 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, it must be disposed of in accordance with the grantor's conditions. If no conditions exist, then disposal will be in accordance with the procedures outlined in Policy 4080 Disposition of Property.
- H. The provisions in Section III. of these procedures 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. History¹

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