

POLICY TITLE: RETENTION OF RECORDS RELATING TO FEDERAL GRANTS

The Board directs the Superintendent to ensure that fiscal records related to federal grants are retained for a minimum of six years from the obligation of funds. These records shall be available for inspection if required.

Procedures

The Agency shall maintain records that fully show:

1. The amount of funds under the grant or sub-grant;
2. How the sub-grantee uses those funds;
3. The total cost of each project;
4. The share of the total cost of each project provided from other sources;
5. Other records to facilitate an effective audit; and
6. Other records to show compliance with federal program requirements.

The Agency shall also maintain records of significant project experiences and results. These records and accounts shall be retained and made available for programmatic or financial audits.

In accordance with State Department of Education record retention policy 4.16.02 Administration of Federal Grant Program, the Agency shall maintain all fiscal and programmatic records relating to federal grants for a minimum of five years and one additional audit.

The Agency will destroy paper records by shredding only. In the event of the disposal of computers or electronic equipment that may contain confidential student or personnel records, the Agency will ensure that hard drives are appropriately “wiped” clean of information prior to disposal.

The Agency shall retain records based on the schedule provided in Policy 8605.

Collection and Transmission of Records

The Agency shall maintain electronic records in the [NAME OF THE SOFTWARE] system, and paper records shall be maintained in the Agency office under the supervision of the Business Manager or designee. The Clerk will have authorized access as directed. Electronic and/or paper records shall be provided to awarding agencies to meet reporting requirements and to auditors and monitors, as appropriate

and required. Records that are kept electronically may be transmitted electronically as allowed by 2 CFR 200.335.

Access to Records

The Agency shall provide the awarding agency, Inspectors General, the Comptroller General of the United States, and the pass-through entity, or any of their authorized representatives, the right of access to any documents, papers, or other records of the Agency which are pertinent to the Federal award, in order to make audits, examinations, excerpts, and transcripts. The right also includes timely and reasonable access to the Agency's personnel for the purpose of interview and discussion related to such documents.

Privacy

Access to both the [NAME OF THE SOFTWARE] system, personnel files, the Student Management System, confidential student files, Special Education IEP files shall be password protected in the case of electronically maintained records and kept in locked filing cabinets in the case of paper records. These records are maintained under the supervision of the Superintendent and the Business Manager, or Federal Programs Director with exclusive access to paper files and passwords for electronic systems. The Agency clerk may also have access to these records. Employees shall be trained in the requirements of the Family Educational Rights and Privacy Act (FERPA). If a request for confidential information is received from a source not having clear authority under FERPA or other statute, the Agency shall consult appropriate legal counsel prior to providing records.

LEGAL REFERENCE:

34 C.F.R. § 76.730-.731
34 C.F.R. § 75.730-.731
34 C.F.R. § 75.732
2 CFR 200.335

POLICY HISTORY:

Adopted: April 15, 2019
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