

Introduction

The federal government provides billions of dollars in grants to over 30,000 organizations annually. This investment of taxpayer dollars means that the federal government must set up strong controls over grant projects to ensure the proper use of public funds. In addition to understanding federal requirements, you are expected to follow the policies of the fiscal agent of the grant—The Washington Student Achievement Council (Council). The Council has additional policies it must follow to comply with state and federal law. It is important to rely on GEAR UP staff when the federal regulations aren't clear on an issue. You also must follow GEAR UP reporting guidelines and budget categories.

Legislation and Program Regulations

GEAR UP is subject to a number of regulatory sources. The following list provides a brief description of each of the major policy sources. More information can be found here:

<http://www2.ed.gov/programs/gearup/legislation.html>.

Uniform Guidance (2CFR200)

The Uniform Guidance (2CFR200) streamlines and consolidates government requirements for receiving and using federal awards so as to reduce administrative burden and improve outcomes. More information can be found here:

<http://www2.ed.gov/policy/fund/guid/uniform-guidance/index.html> .

State Administrative & Accounting Manual (SAAM)

Washington State Administrative and Accounting Manual (SAAM) provides control and accountability over financial administrative affairs of the state of Washington. The policies and procedures in this manual are the minimum requirements that state agencies must meet. More information can be found here:

<https://www.ofm.wa.gov/accounting/saam>.

Time and Effort

All GEAR UP staff must complete a monthly time and effort form and/or a timesheet as required by school district policy and practice. A sample form is available at <http://gearup.wa.gov/grant-management>. Federal regulations require that every GEAR UP staff whose salary is supported in full or in part need to document the time, effort and activities during any given pay period.

Time as match: When you use in-kind personnel contributions as match, they have to fulfill the same reporting obligations as if they were receiving federal funds.

GEAR UP Paid Staff Time

- GEAR UP staff paid with federal funds must be engaged in GEAR UP activities 100% of the time.
- GEAR UP staff must not be assigned lunch duty, hall duty, recess or similar duties.

Supplement but not Supplant

GEAR UP regulations require that GEAR UP funds supplement but not supplant. GEAR UP funds are intended to build the capacity of school districts to create a college going culture. Therefore, GEAR UP funding may be used to enhance what is already in place or to create new activities (supplement). GEAR UP funds cannot be used to replace other federal, state or local funding (supplant). Below are some examples:

- For the last five years, your school has paid for a career exploration software license. This year, the school needs new PE equipment so you have been asked to pay for the software license with GEAR UP funds to free up funding for PE equipment. This is supplanting and is not allowed.
- For the last several years, your school has annually purchased \$500.00 worth of new library books. This year you have been asked to use GEAR UP funds to pay for the books. This is supplanting and is not allowed.
- Annually, your school purchases all materials required for instruction in core content courses, including textbooks and a software package. This year, the science teacher has requested that GEAR UP purchase additional equipment to enhance learning and increase the rigor of the coursework. The school does not have funds available for this purchase. This is not supplanting and is allowed because without GEAR UP funding, your school would not be able to make this purchase.

Washington State GEAR UP Models

GEAR UP funds may be used to pay for activities that support the Washington State GEAR UP goals and objectives, as outlined in the School District Interagency Agreement, Scope of Work, and the Washington GEAR UP Career and College Ready Benchmarks. GEAR UP funds may be used to support GEAR UP eligible students only. No funds may be used for non-GEAR UP eligible students to participate.

To help you decide if costs are allowable or not, ask these questions:

Is the expense:

- ✓ Allowable and necessary to implement the program.
- ✓ Reasonable.
- ✓ Allocable to program objectives.
- ✓ Compliant with the program's federal administrative regulations.

When planning activities and expenditures, schools must follow the guidelines listed below:

For Priority Model Schools

Funds may be used to support activities for eligible GEAR UP students only. Students are eligible for GEAR UP services based on low-income status. This may be determined by free/reduced lunch status or other standard measures of income, such as the family receives TANF, the student is in foster care or homeless or the family receives Social Security Disability. You may elect to serve additional students by including them in GEAR UP activities, but GEAR UP funds may not cover costs for those additional, non-program eligible students.

Examples:

Field Trips:

Option 1: You opt to take only GEAR UP eligible students on the trip and pay the full cost of the trip with GEAR UP funds.

- Option 2: You opt to take both GEAR UP eligible students and other students. There are additional costs associated with taking non-GEAR UP students, such as meals and an entrance fee. In this case, costs are proportionately covered by GEAR UP and other funds.
- Option 3: You opt to take both GEAR UP eligible students and other students. There are no additional costs associated with taking non-GEAR UP students. In this case, GEAR UP may pay the full cost of the trip.

Classroom Materials: You may purchase classroom materials with GEAR UP funds proportionate to the number of eligible GEAR UP students in the class.

Pre-College Assessments: GEAR UP eligible students are eligible for waivers of test fees, so in most cases GEAR UP eligible students may take these assessments at no cost.

For Cohort Model Schools

Funds may be used to support activities for all students in the Class of 2023. If you opt to include additional students in any GEAR UP sponsored activities, costs must be covered proportionately from other funds. See examples above for priority schools for guidance. If there are no additional costs incurred for non-GEAR UP students to participate, GEAR UP may pay for the full cost of the activity.

New Students

New, eligible students may be added at any time throughout the grant period. Once a student is deemed eligible, they remain eligible for the remainder of the grant period.

Property of GEAR UP

All supplies, materials and equipment purchased with GEAR UP funds are the property of the Washington state GEAR UP program. They must be used exclusively to serve eligible GEAR UP students and remain with the program through the end of the grant.