

**PENNSYLVANIA DISTANCE LEARNING CHARTER SCHOOL**

**Book:** Policy Manual  
**Section:** Federal Programs  
**Title:** Drawdowns and Reimbursement Requests Policy  
**Adopted:** February 29, 2016

**Revised:**

**PURPOSE:** The purpose of this Policy is to ensure requested grant and subgrantee funds of PDLC are for immediate needs, limited the time between receipt of funds and disbursement. This policy is intended to supplement but not replace any applicable State or Federal laws governing Federal grants applicable to nonprofit and public cyber charter schools.

**SCOPE:** The Policy applies to the Board of Trustees, school administration, and other school employees with Board delegated powers direct or indirect in grant expenditure decisions related to the school.

**POLICY AUTHORITY:** Policy draft is reviewed by the CEO of PDLC; then (1) sent to the Board of Trustees, and (2) presented at the next formal, public Board Meeting for review, public comments and approval.

**DEFINITIONS:**

**Subgrantee:** The government or legal entity to which a sub-grant is awarded and which accountability for the proper use of funds is provided.

**Grant Program Manager:** Provides oversight and coordination of Federal and State grant activities for the School.

**DETAILED POLICY STATEMENT:** The School receives grant funds in multiple ways. Some grant programs provide all of the funds up-front via a lump sum check or wire transfer, some grants are disbursed in regularly scheduled payments, and some grants require the School to request reimbursement after program expenses have been incurred through the use of invoices or cash draw downs. Most funding agencies, Federal and non-Federal, specify the particular method required for requesting grant funds. In order to avoid funding delays (or potential penalties or funding withdrawal), the School must abide by the grantor's rules and regulations.

For Federal grants awarded before December 26, 2014, 34 CFR Part 80.21 states that a grant recipient or subgrantee of Federal funds shall minimize the time elapsing between the transfer of funds from the Federal government and disbursement by the grant recipient or subgrantee. Federal grants awarded on or after December 26, 2014 must adhere to 2 CFR 200.305 which requires that an entity's payment

methods minimize the time elapsing between the transfer of funds from the United States Treasury and the disbursement of these funds.

For all funding methods, the School will follow the grantor's preferred method of requesting funds while attempting to minimize the time between fund receipt and the disbursement of grant funds for program-related expenditures.

Regardless of the method of grant fund receipt, all program expenditures that will be paid for with grant funds must be allowable and meet applicable cost restrictions.

Grant fund receipts will be deposited and coded to the correct amount by the Business Manager and will be reported accurately to the grantor.

The Grant Program Manager (GPM) and Chief Executive Officer are responsible for supporting the Business Manager's efforts to ensure compliance with grant fund receipt requirements. GPMs are responsible for ensuring that grant funds received are expended in accordance with all grantor regulations and Allowable Uses of Funds and Adherence to Cost Circulars for Federal grants awarded. Any funds received directly by the GPM should be forwarded to the Business Manager.

The GPM is expected to have a full understanding of grant requirements and regulations pertaining to cash management. GPMs are responsible for monitoring expended disbursements and forecasting cash flow needs and for executing cash drawdowns using invoices or the grantor-preferred method (this may include grantor operated web-based systems). GPMs will retain all documentation related to requested drawdowns, reimbursements and any scheduled pay based requests. Any funds received directly by the GPMs should be forwarded to the Business Manager.

The Business Manager is responsible for notifying GPMs and Chief Executive Officer when grant funds are received directly by the Business Office. The Business Office is responsible for processing any grant funds received by other offices or staff and forwarded to them. The Business Office will ensure that deposited funds are coded to the proper grant accounts and will seek guidance from the GPM if the proper account is unknown.