

CASE STUDY

CLIENT	<ul style="list-style-type: none">• Large California school district with 54 schools and 40,000 students.• Gaining Early Awareness and Readiness for Undergraduate Programs (GEAR UP) grant recipient.
CHALLENGE	<ul style="list-style-type: none">• District did not have sufficient documentation to support claimed matching contributions for the first three years of the grant.• Grant program staff did not understand federal matching funds requirements and documentation standards.• Over \$1 million in federal funds claimed as match. Unallowable.• Claimed more in matching contributions, in their Annual Performance Reports, than required by their grant application.• Lack of documentation placed the school district at risk to refund \$2.75 million to the federal government.
SOLUTION	<ul style="list-style-type: none">• Formed a six-member Corrective Action Team consisting of representatives from the district's Educational Services department, the Grant Development office and the GEAR UP program. The Corrective Action Team reported directly to the Deputy Superintendent.• Recovered, replaced or recreated documentation that was lost or accidentally destroyed.• Provided ongoing professional development to grant program staff on federal regulations, documentation and matching requirements.• Reported findings and corrective action to federal program officer.
RESULTS	<ul style="list-style-type: none">• After six months, documentation for more than \$2.4 million was either collected or recreated to reduce the payback risk to \$267,000 from the original \$2.75 million.• Arrangements made with the US Department of Education to satisfy the undocumented \$267,000 in match.• New policies and procedures implemented for ongoing staff training, ongoing documentation audits and Central Office review of all reports prior to submission to the US Department of Education.
BEST PRACTICES / LESSONS LEARNED	<ul style="list-style-type: none">• Matching contributions need to be documented in the same manner as program expenses. (2 CFR 200.306 and 2 CFR 200.430)• Do not pledge more in match than required by program guidelines and/or do not report matching funds in excess of what was originally committed.• Program staff should receive grant management training before new projects begin and throughout a grant's lifecycle.• Program expenses and documentation should be reviewed (audited) at regular intervals during a grant.

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