Ohio | Department of Education

CCIP Note # 363

Re: Carryover Policy for Eligible Grants
Date: July 1, 2016
To: Superintendents, Treasurers, Title I Directors/Coordinators and Consolidated Application Contacts

Policy
The Ohio Department of Education's Office of Federal Programs will allow districts (subgrantees), at the time of submitting their budgets, to specify in the CCIP history log their anticipated federal grant carryover amounts and how they intend to spend them during the upcoming fiscal year. The date the Office of Federal Programs responds with approval in the history log to the district's request will serve as the date these carryover funds are substantially approved for obligation.

This policy will assist districts in ensuring they have the maximum amount of availability to obligate their carryover funds. This policy is contingent on the district submitting and receiving approval from the Office of Federal Programs for a budget revision detailing the use of the carryover funds that is consistent with their history log requests. The budget revision must be submitted within 30 days after approval of the final expenditure report (FER).

Please Note: This policy affects grants that are already eligible for carryover (i.e. Title I-A, Title II-A). If a grant does not permit carryover, this policy has no impact.

Background Information on Policy
Districts are given preliminary federal grant allocation amounts for the new federal fiscal year typically in June. The fiscal year begins on July 1. Districts submit budgets to the Office of Federal Programs through the CCIP on the use of their federal funds. Those budgets are generally approved by the Office of Federal Programs on or before July 1. Once the budget is submitted and approved, it establishes a "substantially approvable form" for which a grantee may obligate funds. Generally, a district's initial budget does not account for the allowable carryover amounts of certain federal grants. These carryover amounts are not finalized until the approval of the FER. The FER is typically approved between October and December of the current fiscal year. Therefore, the carryover funds are not accounted for in the initial budget and do not receive a substantially approved date for obligation until the district submits a budget revision reflecting those carryover amounts. The above policy will change this practice.

Rationale
34 C.F.R. 76.708 specifies that the state may not authorize an applicant for a subgrant to obligate funds until "the date that the applicant submits its application to the state in substantially approvable form."

- The Office of Federal Programs considers the CCIP history log comment on the use of carryover funds to be part of the initial application pending an approved budget revision after the completion of the FER.