Policy Statement
The School District of Philadelphia will ensure that only eligible individuals participate in grant-funded programs, that subawards are made only to eligible subgrantees, and that amounts provided to or on behalf of eligible individuals or groups of individuals were calculated in accordance with program requirements.

Reason for Policy
Eligibility applies to most federal programs which provide services or benefits to individuals, groups of individuals, or make subawards. Eligibility requirements specify the criteria for determining the individuals (including area of service delivery), groups, or subgrantees that can participate in the program and the amounts for which they qualify. The specific requirements for eligibility are unique to each program and are found in the laws, regulations, and the provisions of contracts or grant agreements pertaining to the program. The District must ensure compliance with these various eligibility requirements.

Policy Requirements
While the criteria for determining eligibility vary by program, the District shall ensure that eligibility requirements are systematically identified for all grant programs during the grant development process and that any required periodic determination of eligibility is performed. Each grant program should be able to demonstrate that each eligibility requirement is being met.

The GPM must work in conjunction with other District offices (ORE, Student Data, etc.) to gather sufficient, accurate data necessary to determine eligibility and to document and support determinations of eligibility. If eligibility determinations are based on external data, the GPM must ensure that appropriate measures (as determined by each program’s regulations) have been taken to ensure the accuracy of that data as well, prior to determining eligibility.

If a GPM determines that a subgrantee will be awarded District grant funds, that GPM must ensure that subawards are made only to eligible subgrantees and that the subaward will comply with the District’s policy GP0600 Subgrantee Identification and Monitoring.

All individuals who determine and review eligibility are bound by the District’s Employee Code of Ethics.
Grant Program Managers (GPMs), Grants Compliance Monitors (GCMs) and any other district employees involved in determining participant or subgrantee eligibility or monitoring participant or subgrantee eligibility must consider and ensure that program specific eligibility requirements are met at the following times:

- Program and award budget development
- Budget amendments
- Creation and processing of journal vouchers (JVs)
- Expenditure of grant funds
- Review of grant expenditures
- Program closeout
- Financial year closeout

**Responsibilities**

**Grant Program Managers** (GPMs) are responsible for identifying any grant program eligibility requirements during the grant development process and communicating those requirements with program staff responsible for eligibility determination. GPMs will ensure that the characteristics of individuals or groups participating in the program meet all eligibility requirements of the grantor. In connection with the District’s policy *GP 0600 Subgrantee Identification and Monitoring*, GPMs are responsible for determining that subawards are made only to eligible subgrantees. GPMs must consider how eligibility requirements will be affected throughout administration of the grant program including during program and budget development, budget amendments, journal voucher (JV) processing, expenditure of grant funds, and the grant and financial closeout periods.

If any GPM eligibility decisions are disallowed or denied, the GPM may appeal the denial to the Executive Director of the Office of Grants Compliances. The decision of the Executive Director is final.

**OGDC Grants Development Specialists** will assist GPMs in identifying any participant or subgrantee eligibility requirements during the grant development process.

**OGDC Grants Compliance Monitors (GCMs)** are responsible for monitoring that the eligibility requirements of all programs are being identified and properly followed for the program(s) he/she monitors. Specifically, GCMs should review eligibility documentation and ensure that all budgets, amendments, JVs and expenditures provide services for or benefit only eligible individuals or subgrantees.
Procedures

- *GP0500.1 Meeting Eligibility Requirements*

Forms

Definitions

Contacts

- *Office of Grant Development and Compliance*

Frequently Asked Questions

Related Information

- *GP0600 Subgrantee Identification and Monitoring*
- *Policy GP1400 Documentation and Record Retention*
- *Excluded Parties List System*
- *District’s Employee Code of Ethics*

History

Amended:

- Amended on 4/20/2015 to make technical adjustments.