



Policy: Contracted Services for Grant Funded Programs	Category: Procurement and Contracting		Number: GP1700
	<input type="checkbox"/> Complete Revision <input type="checkbox"/> Partial Revision <input checked="" type="checkbox"/> New	Supersedes:	Page: Page 1 of 3

Policy Statement

The School District of Philadelphia is committed to ensuring that contracts for services for grant funded programs align with program goals and grant requirements and that rates presented in contracts for services are fair and reasonable. The District will properly review proposed contracts and invoices for services related to grant programs to ensure these goals are met.

Reason for Policy

The District is responsible for ensuring that expenditures related to grants comply with the requirements of policy *GP0800 Allowable Uses of Funds and Adherence to Cost Circulars*. One of the requirements of this policy is that costs are necessary and reasonable for proper and efficient performance and administration of the grant program. By reviewing contracts for services for alignment with goals and reasonableness of rates, the District is performing an initial review of allowability of costs.

Policy Requirements

The procurement of services using federal or non-federal grant funds must also adhere to the District policies and procedures described in the *District's Contract Handbook and District Procurement Policy and Procedures Manual*, and SDP Policy *GP1600 Procurements Using Grant Funds*. Grant Program Managers/Principals will ensure that contracts are necessary for the achievement of the purposes for which the grant was given.

Grant Program Managers (GPMs)/Principals will submit service contracts to the Limited Contract Committee, District's Office of General Counsel and/or the SRC only after ensuring that potential vendors are authorized to provide services, that the services to be provided meet all grant program requirements and that sufficient grant funds exist. Vendor selection for service contracts should be executed in accordance with District policies and procedures including the *District Procurement Policy and Procedures Manual* and *GP1800 Suspended, Disqualified or Debarred Vendors to be Paid with Grant Funds*. Service contracts may also be awarded through noncompetitive means under certain circumstances as outlined 2 CFR Part 200.320.

The Limited Contract Committee will review prospective contracts under \$20,000 and evaluate the contract's potential effect on grant compliance. Contracts over \$20,000 will be reviewed by the Office of General Counsel and the SRC. Contracts over \$20,000 will also require additional approval through SRC resolution.

The Office of Procurement in concert with the GPM will ensure that if a vendor is providing similar services under multiple contracts, that any service and the applicable rates provided are consistent across all contracts prior to this review.

As applicable, contracted services for grant funded programs will follow the guidelines of 2 CFR Part 200.

Services contracts with faith-based organizations are allowed provided there is no discrimination for or against the organization and provided that the faith-based organization offers any religious worship, instruction or proselytization at a time and in a location separate from any programs or services provided to the District and any participation in such services by beneficiaries of grant programs is voluntary

Responsibilities

Grant Program Managers (GPMs) and Principals will determine the services that need to be subcontracted and will submit Limited and Standard Contract proposals in accordance with the *District's Contract Handbook*, including SDP Policy *GP1600 Procurements Using Grant Funds* and will ensure that grant funds are available for any proposed service contracts submitted. They will ensure that services sought meet applicable cost allowability guidelines as set forth in the District's policy *GP0800 Allowable Uses of Funds and Adherence to Cost Circulars*, that potential service providers are vendors are not disqualified, suspended or debarred as set forth in the District's policy *GP1800 Suspended, Disqualified or Debarred Vendors to be Paid with Grant Funds*. GPMs are encouraged to contact OGDC prior to the issuance of any RFPs to ensure compliance with grant requirements and to consult the *Procurement Requirements Matrix* for guidance on when to use a specific type of procurement method.

GPMs are responsible for monitoring service contracts and ensuring that payment is not made until agreed upon services are actually received according to the terms of the contract and satisfactory, that payment for services is made in a timely fashion and that documentation of contracted services is maintained in and "audit ready status" in accordance with District Policy *GP3200 Documentation and Record Retention*. GPMs will require that contractors submit invoices that provide itemization of charges and description of work performed prior to payment. GPMs will ensure that a District staff person with direct knowledge of the services delivered verifies the accuracy of the billing by signing or initialing all invoices for contracted services before those invoices are processed for payment, and GPMs will retain copies of signed/initialled invoices in the grant program file.

For all contracted services, GPMs, with the assistance of the Grant Compliance Monitor assigned to the grant program, will identify any services to be performed under a subgrantee relationship (See District Policy *GP1500 Subgrantee Identification and Monitoring*).

GPMs are encouraged to seek guidance from the Office of Grant Development and Compliance as they obtain service contracts.

Limited Contract Committee will review contracts under \$20,000 and verify that contracted services are aligned with program goals and satisfy compliance requirements before final approval.

Office of General Counsel will review contracts over \$20,000 for legal requirements and will prepare contracts for SRC consideration.

Office of Procurement will, to the degree possible, review service contracts for consistency of service rates across any other contracts the vendor has with the District. When service contracts are competitively procured (which must be done for all federally-funded service contracts over \$100,000), the Office of Procurement will also oversee the Request for Proposal process.

SRC will review and authorize contracts over \$20,000.

Executive Director, Grant Compliance will review grant contracts above \$20,000 drafted by the Office of General Counsel to ensure that the contract is consistent with the approved SRC resolution and the terms of the grant agreement.

Grant Compliance Monitor (GCMs) will assist Program Managers in identifying any services to be performed under a subgrantee relationship. GCMs will also periodically review service contracts to ensure that they are compliant with all grant program requirements.

Procedures

Forms

- *SDP Procurement Requirements Matrix for Grant Funds*

Definitions

Contacts

- *Grant Compliance Office*
- *Office of Grant Development*
- *Office of General Counsel*
- *Office of Procurement*

Frequently Asked Questions

Related Information

- *District Contract Handbook*
- *GP1500 Subgrantee Identification and Monitoring*
- *GP1600 Procurements Using Grant Funds*
- *GP0800 Allowable Uses of Funds and Adherence to Cost Circulars*
- *GP1800 Suspended, Disqualified or Debarred Vendors to be Paid with Grant Funds*
- *GP3200 Documentation and Record Retention*
- *Web Address for OMB A-102: http://www.whitehouse.gov/omb/circulars_a102*
- *SRC policy 610 Purchases Subject to Bid*
- *SRC policy 611 Purchases Budgeted*
- *SRC policy 612 Purchases not Budgeted*
- *SDP Office of Procurement Services: Policies and Procedures Manual (2008)*
- *Office of General Counsel: <http://webgui.phila.k12.pa.us/offices/g/generalcounsel/>
2 *CFAR Part 200**

History

Amended:

- Amended for updates on 9/23/2013 to reflect amended threshold for limited contracts.
- Amended on 5/8/2015 for reference updated for the Uniform Grant Guidance and technical adjustments.

Issue Date: 7/1/2102	Effective Date: 7/1/2015	Approved by: Chief Grant Development and Compliance Officer
-------------------------	-----------------------------	----------------------------------------------------------------