AMERICAN SAMOA DEPARTMENT OF EDUCATION
P.O. Box DOE, Pago Pago, AS 96799
Tel#: (684) 633-5237/5238/4255/4256
Website: https://www.doe.as

ASDOE GRANTS POLICY AND PROCEDURES MANUAL

UPDATED: NOVEMBER 2023 - APRIL 2024

TABLE OF CONTENTS

1: Introduction

1.1 Purpose and Scope of Policy

The objective of this policy is to clearly assign responsibilities for grant administration and to establish a streamlined process for the daily management of federal grant awards within the American Samoa Department of Education (ASDOE).

1.2 Overview

A grant is essentially a financial award given by an organization, like the government, for a specific purpose. For the American Samoa Government (ASG), this means receiving funds from the United States Federal Government to support various educational programs and initiatives within the American Samoa Department of Education. These grants are governed by a host of federal laws, regulations, and guidelines that dictate financial management and reporting. Despite these complexities, the essence of a grant is to provide financial support for specific goals, such as enhancing teacher training, expanding after-school activities, or improving educational technology.

Effective use of grant funds is crucial for achieving these goals. Lack of planning or weak internal controls can lead to mismanagement of these funds. Therefore, it's vital for everyone involved in grant administration to clearly understand their roles and the processes involved to ensure successful project completion within set timelines.

1.3 Organizational Chart - FGMO
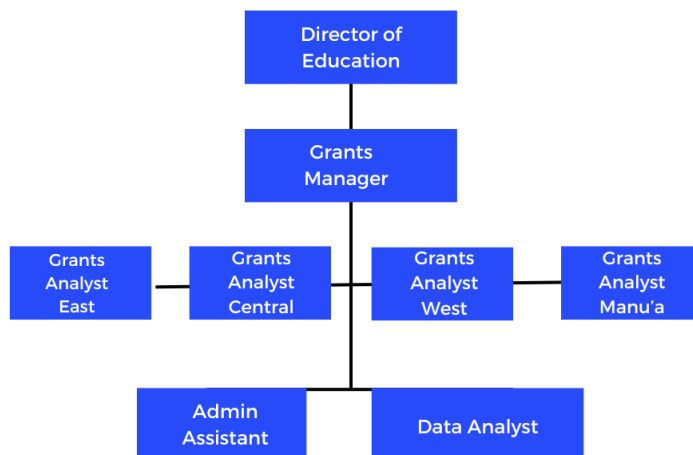
2: Roles and Responsibilities

Administering Federal grants involves collaboration across multiple departments, including the Budget Department, Treasury, and Procurement Office. However, the primary responsibility for achieving the grant's objectives and complying with its terms falls to the grant recipient, in this case, the ASDOE. It is crucial for the ASDOE to clearly understand and assign specific responsibilities within its organization to ensure the grant's success for specific areas.

2.1 Federal Grants Manager

The Federal Grants Manager (FGM) plays a pivotal role in managing the Federal Grant Management Office (FGMO), which includes a team of Grant Analysts, Data Personnel, and an Administrative Assistant. This position provides leadership and direction for federally funded programs and serves as the Program Director for the ASDOE Federal Grants Office to oversee administrative work which includes supervision of employees within the Grants Office, and ensure that programs staff accomplish their appropriate and approved program activities. The incumbent monitors federal grant programs to ensure administrative efficiency and compliance with federal regulations and local laws and standards, and makes sure that all Public and Non-Public Projects meet compliance and reporting requirements. Assist in the budget development process and perform budget analysis duties alongside the ASDOE Chief Financial Officer. This position oversees all LEAs in Public and Non-Public, manages the implementation of grant programs, and compiles monitoring reports and budget tracking analysis.

Together, they ensure the effective administration of federal grants, with a particular focus on Consolidated Grants. The Federal Grants Manager reports directly to the Director of Education. The Grant Manager Position serves also as a Project Director for the Consolidated Grant Management Office and a liaison between the United States Department of Education and the American Samoa Department of Education to clarify, interpret, and review LEA's grant proposals and application. Reviews and monitors the implementation of other direct grant awards through the United States Department of Education Office of Elementary and Secondary. Prepares and submits grant award monitoring reports directly to the ASDOE Director of Education who is also the State Director to all ASDOE Federal Grants. The FGM's duties encompass:

        • **Grant Awarding and Agreement Management:** Upon grant approval, the FGM reviews and finalizes the grant agreement, outlining terms for fund use, reporting requirements, project timelines, and expected deliverables. This oversight guarantees adherence to all grant conditions.

• **Process Optimization:** The FGM spearheads the creation of streamlined grant processes in collaboration with both internal and external stakeholders, ensuring efficiency and mutual benefit.

• **Financial Reporting:** The FGM is responsible for generating comprehensive financial reports, providing clear visibility into grant progress and fiscal accountability.

• **Document Management:** Efficient distribution and organization of critical documents are managed to ensure ease of access and security.

• **Monitoring and Evaluation:** The FGM conducts regular reviews to compare project progress against benchmarks, adjusting strategies as needed to meet objectives and ensure efficient fund utilization, with transparent reporting to both grantors and grantees.

• **Compliance Oversight:** The FGM ensures projects comply with financial guidelines, cost allocations, progress reporting, procurement standards, and adherence to relevant policies and regulations at all levels, ensuring integrity and accountability.

• **Grant Closeouts and Audits:** At the grant's conclusion, the FGM oversees a thorough closeout process, including final reports, audits, financial reconciliations, and submission of necessary documentation to grantors, fostering ongoing positive relationships and accountability.

This comprehensive role ensures that federal grants are managed effectively, aligning with allocable, allowable, and reasonable.

2.2 Federal Senior Grants Analyst

To oversee the successful implementation of grant-funded projects, particularly Consolidated Grants, ensuring compliance with State and Federal regulations while maximizing the impact of funds allocated. The Senior Grant Analyst is responsible for overseeing all projects under Consolidated Grants and assists the Federal Grants Management Offices Manager in planning, analyzing, and fulfilling District Grant functions related to budget and compliance in a timely and professional manner.

- **Ombudsman Consulation:** Serve as a general resource regarding equitable service requirements for both LEAs and private school officials, which may include conducting initial outreach to define the contours of the ombudsman's responsibilities.
- **Grant Proposal Management:** Prepares and compiles all components of each grant request, ensuring that requests are formatted and submitted following Federal grant requirements.

- **Project Oversight**: Monitors the implementation of grant-funded projects to ensure that budgeting and administrative policies, procedures, and agency requirements are followed.
- **Problem Resolution**: Manages administrative problems and/or budget changes occurring during the awarding granting period. Maintain a consolidated grant award calendar for all projects. Consult with the Project Leads and assistants in implementing qualitative activities for the academic success of students.
- **Regulatory Compliance:** Maintains knowledge of grant funding policies, regulations, and procedures; disseminates and/or presents changes to Project Leads and advises on implementing changes and the impact of changes on funded operations.
- **Training and Assistance:** Conducts training for LEAs and assists in completing Federal reports and evaluations. Provide information and technical assistance to staff and Project Leads regarding the assigned budget programs and preparation of grant applications and funding agreements.
- **Budget Program Support:** Participates in developing and implementing new or revised budget programs; develops technical support for LEAs; and monitors internal procedure and protocol of requests.
- **Relationship Management:** Establishes and maintains effective working relationships with various groups or individuals. Communicates with federal liaisons regarding grant management, review, implementation, and monitoring for effectiveness.
- **Reporting and Documentation:** Prepares weekly budget position reports for LEAs. Develops and maintains specialized databases and systems for recording and tracking grant requests, proposals, and related information. Monitor the activity of any sub-grantees where applicable to ensure that they accomplish their stated goals and objectives and adhere to grant terms and conditions. Maintain well-organized grant files that contain all required and pertinent documents related to the performance of the grant award goals and objectives; annually certify that the grant files are complete.
- **Monitoring and Evaluation:** Creates and distributes standard and special reports, summaries, and analyses, as Federal and State regulations require. Prepares monitoring and evaluation reports for LEAs of designated districts and submits them to the Grant Manager. Develop and prepare reports to monitor the progression of each project under the Consolidated Grant.
- **Federal Liaison:** Ensure that grant-funded activities and purchases are allowable, reasonable, and serve to achieve the purpose of the grant. Review data and reports from Project Leads to ensure that the FGMO can submit timely and accurate financial and progress reports to the USDOE

- **Intra-Office Personnel:** Verify Purchase Requisitions upon requests from the Business office. Review vendor agreements for compliance, consistency, and funding availability.
- **Policy Consultant:** Set up meetings, write agendas, and conduct meetings with internal offices with responsibilities relating to federal grants. Create timelines, deadlines, and responsibilities for updating manuals in policy regulations and operations procedures. Meet with USDOE to discuss policies, review procedures, and make recommendations for the ASDOE in monitoring and accountability of federal regulations
- **Grant Writer**: Develop and write grant proposals for COVID Funds. Monitor and evaluate the implementation of programs and activities under the following additional grants
- **Inter-Government Agent & Liaison Officer:** Meet with various ASG Departments, vendors, and contractors for consultation on uses of federal funds under the Department of Education. Align updated standards of procedures and policies with external departments and agencies over federal regulations. Provide an Action Plan on internal and external regulations with ASG

2.3 Federal Grants Analyst II

To oversee the successful implementation of grant-funded projects, particularly Consolidated Grants, ensuring compliance with State and Federal regulations while maximizing the impact of funds allocated.

Responsibilities:
- **Grant Proposal Management:** Prepares and compiles all components of grant requests, ensuring adherence to Federal grant requirements in formatting and submission.
- **Project Oversight:** Monitors the implementation of grant-funded projects, ensuring adherence to budgeting and administrative policies, procedures, and agency requirements.
- **Problem Resolution:** Manages administrative challenges and budget changes arising during the grant award period, maintaining project continuity.
- **Regulatory Compliance:** Maintains up-to-date knowledge of grant funding policies, regulations, and procedures, disseminating changes to Project Leads and advising on implementation impact.
- **Training and Assistance:** Conducts training sessions for LEAs, offering technical assistance in completing Federal reports and evaluations.

- **Budget Program Support:** Provides information and technical support to staff and Project Leads on budget programs and grant application preparation, ensuring compliance.
- **Process Improvement:** Participates in developing and implementing new or revised budget programs, monitoring internal procedures and protocols, and providing technical support for LEAs.
- **Relationship Management:** Establishes and maintains effective working relationships with various stakeholders involved in grant administration.
- **Reporting and Documentation:** Prepares weekly budget position reports for LEAs, develops specialized databases for recording and tracking grant requests, and creates standard reports as required by Federal and State regulations.
- **Monitoring and Evaluation:** Prepares monitoring and evaluation reports for LEAs, ensuring alignment with grant objectives and submitting them to the Grant Coordinator.

2.4 Project Lead/Subgrantees:

The Project Lead plays a crucial role in steering grant-funded projects towards success, ensuring that all goals and objectives outlined in the grant are achieved within the set timelines. This position is often held by an Assistant Director (AD), Program Director (PD), or Office Manager, tasked with a variety of critical functions:

- **Budget Compliance**: Oversee the proper use of grant funds, ensuring all expenditures align with the grant's budget specifications.
- **Request Submission**: Submit all necessary requests to the Federal Grant Management Office (FGMO), adhering to the allowable guidelines outlined in the project and budget narratives.
- **Monitoring Requests**: Regularly follow up on the status of submissions with respective offices, updating any expired invoices and contracts as needed.
- **Amendment Requests**: Prepare and submit any required amendments to the FGMO for review and approval, ensuring the project remains aligned with its goals.
- **Financial Reporting**: Request up-to-date budget and expenditure reports to maintain a clear view of the project's financial status.
- **Progress Reporting**: Provide timely data and quarterly reports to the FGMO, facilitating accurate and punctual financial and progress reporting.

By fulfilling these responsibilities, the Project Lead ensures the project remains on track, compliant, and fully aligned with the grant's intended outcomes.

2.5 Fiscal Officer

The Fiscal Officer plays a pivotal role in managing the financial aspects of grant administration, ensuring adherence to grant guidelines and accurate financial record-keeping. In the absence of a designated Fiscal Officer, these responsibilities fall under the purview of the ASDOE Chief Financial Officer. Key responsibilities include:

- **Budget Tracking System:** Establishing and maintaining a robust system for tracking grant expenditures by budget category, ensuring transparency and
- **Accounting Compliance**: Ensuring that all expenditures are properly documented, coded with appropriate accounting codes, and charged to the correct grant account, in compliance with grant regulations.
- **Budget Management**: Verifying the availability of funding in relevant budget categories before approving expenditures, and maintaining fiscal responsibility.
- **Financial Reporting:** Preparation and submission of required financial reports, such as the SF-425 Federal Financial Report, in a timely and accurate manner, ensuring compliance with grant reporting requirements.
- **Budget Amendments:** Preparation of BUD-202 forms to establish grant accountants and facilitate fund transfers between budget categories as needed to support project objectives.
- **Account Reconciliation:** Regular reconciliation of grant financial data with the ASG Treasury's accounting system to ensure accuracy and alignment with financial records.
- **Documentation Management:** Maintaining well-organized financial files containing all relevant documentation related to the financial management of the grant, facilitating audit readiness and accountability.

Additionally, the Fiscal Officer plays a crucial role in providing financial guidance and support to project leads, ensuring effective utilization of grant funds and adherence to fiscal policies and procedures.

2.6   Deputy Directors

Deputy Directors play a pivotal role in the oversight and management of divisions and offices within the ASDOE, ensuring the effective implementation of grant activities. Key responsibilities include:

- **Supervision and Oversight:** Directly supervising and overseeing all grant activities within their divisions or offices, ensuring alignment with grant objectives and compliance with regulations.

- **Quality Assurance:** Implementing quality assurance measures to ensure the successful execution of grant-funded projects, maintaining high standards of performance and accountability.
- **Strategic Leadership:** Providing strategic direction and guidance to divisional or office teams to maximize the impact of grant funds and achieve desired outcomes.
- **Resource Allocation:** Allocating resources effectively to support grant activities, optimizing budget utilization and project delivery.
- **Stakeholder Engagement:** Collaborating with internal and external stakeholders to facilitate effective grant implementation, fostering partnerships and communication channels.
- **Performance Monitoring:** Monitoring the progress and performance of grant activities within their divisions or offices, identifying challenges and implementing corrective actions as needed.
- **Reporting and Compliance:** Ensuring timely and accurate reporting on grant activities, maintaining compliance with grant requirements and regulatory standards.
- **Capacity Building:** Providing support and professional development opportunities to staff involved in grant activities, enhancing their skills and capabilities.
- **Risk Management:** Identifying and mitigating potential risks associated with grant implementation, safeguarding grant funds and project outcomes.
- **Continuous Improvement:** Continuously evaluating and refining grant management processes and procedures to enhance efficiency and effectiveness.
- **Adherence to Policies**: Ensuring adherence to ASDOE policies and procedures, promoting ethical conduct and integrity in grant administration.

2.7 Director of Education:

The Director of Education holds ultimate responsibility for the performance of the grants management teams within the ASDOE, ensuring effective grant administration and compliance. Key responsibilities include:

- **Staff Competence:** Ensuring that staff involved in the grant process possess the necessary knowledge and skills to manage Federal grant programs effectively, fostering professional development opportunities as needed.
- **Financial Oversight:** Reviewing and authorizing all expenditures and reports prepared by the Grant Coordinator and/or Fiscal Officer, ensuring accuracy and compliance with grant requirements.

- **Internal Controls:** Promoting a work environment that encourages the practice of strong internal controls, safeguarding grant funds and ensuring accountability.
- **Supervision and Performance Management:** Providing appropriate levels of supervision to grant managers, ensuring they perform their duties at a high level of competence, and taking corrective action when necessary to address performance issues.
- **Communication and Liaison:** Serving as the primary point of contact between the ASDOE and the funding agency, facilitating effective communication and collaboration to support grant objectives.
- **Strategic Leadership:** Providing strategic direction and guidance to the grants management teams, aligning grant activities with organizational goals and priorities.
- **Compliance Assurance:** Ensuring compliance with grant regulations, ASDOE policies, and relevant laws, mitigating risks and promoting ethical conduct in grant administration.
- **Stakeholder Engagement:** Engaging with internal and external stakeholders to promote transparency, foster partnerships, and support grant implementation efforts.
- **Continuous Improvement:** Promoting a culture of continuous improvement within the grants management teams, identifying opportunities for enhancement and implementing best practices.
- **Performance Evaluation:** Regularly evaluating the performance of the grants management teams, providing feedback,

3: Regulatory Overview

Grant management is based on regulations contained in the following sources:

- [American Samoa Code Annotated (A.S.C.A) (Updated August, 2021)](#)
- [Office of Elementary and Secondary Education](#)

3.1: ASG Policy and Guidance(Updated August, 2021)

3.1.1. Compliance with Procurement and Contracting Requirements (Feb 28, 2024): This memorandum was sent out to all members of the American Samoa Government Directors and members of the current administration cabinet members. This set precedence on the misappropriation of practices when it comes to completed projects funded under ASG, including ASDOE. (Form on Appendix)

3.1.2. Section 15: Education: The government shall operate a system of free and non-secretarian public education. The government will also encourage qualified persons of good character to acquire further education, locally and abroad, both general and technical, and thereafter to return to American Samoa to the end that the people thereof may be benefited. (Excerpt from the Revised Constitution of American Samoa)

3.1.3. Chapter 11: Equal Opportunity-Affirmative Action, Title 04 - Government Employees. An affirmative action plan has been prepared for use by ASG in its efforts to provide equity in employment to women, minors, and other victims of discrimination. This EEO-AA plan is intended to confirm to federal requirements of Title VI of the Civil Rights Act of 1964.
(https://asbar.org/regulation/4-1102-affirmative-action-conformance-to-federal-provisions/)

3.2: Federal Laws and Regulations

3.2.1: Edgar Assurances (34 CFR 76.132) In order to receive funding under the Consolidated Grant Program, an Insular Area must submit the assurances below in its application. These assurances remain in effect for the duration of the projects they cover.

- ☐ Follow policies and use administrative practices that will insure that non-Federal funds will not be supplanted by Federal funds made available under the authority of the programs in the consolidated grant;
- ☐ Comply with requirements in the authorizing statues and implementing regulations for the programs under which funds are to be used and administered;
- ☐ Provide for proper and efficient administration of funds in accordance with the authorizing statues and implementing regulations for those programs under which funds are to be used and administered;
- ☐ Provide for fiscal control and fund accounting procedures to assure proper disbursement or, and accounting for, Federal funds received under the consolidated grant;
- ☐ Submit an annual report to the Secretary containing information covering the program or programs for which the grant is used and administered, including the financial and program performance information required under 2CFR 200.327 and 200.328;
- ☐ Provide that funds received under the consolidated grant will be under control of, and that title to property acquired with these funds will be in, a public agency,

institution, or organization. The public agency shall administer these funds and property;

☐ Keep records, including a copy of the application document under which funds are to be spent, which show how the funds received under the consolidated grant have been spent;

☐ Adopt and use methods of monitoring and providing technical assistance to any agencies, organizations, or institutions that carry out the programs under the consolidated grant and enforce any obligations imposed on them under teh applicable statues and regulations;

☐ Evaluate the effectiveness of these programs in meeting the purposes and objectives in the authorizing statues under which progam funds are used and administered;

☐ Conduct evaluations of these programs at intervals and in accordance with procedures the Secretary may prescribe; and

☐ Provide appropriate opportunities for participation by local agencies, representatives of the groups affected by the programs, and other interested institutions, organizations, and individuals in planning and operating the programs.

3.2.2: Legal and Regulatory Requirements - Consolidated Grant for the Insular Areas - Statutory Authority (Public Law 95-134): An Act to Authorize certain appropriations for the territories of the United States, to amend certain Acts relating thereto, and for other purposes. Be it enacted by the Senate and House of Representatives of the United States of American in Congress assembled.

TITLE V

SEC. 501. In order to minimize the burden caused by existing application and reporting procedures for certain grant-in-aid programs available to the Virgin Islands, Guam, American Samoa, the Trust Territory of the Pacific Islands, and the Government of the Northern Mariana Islands (hereafter referred to as "Insular Areas") it is hereby declared to be the policy of the Congress that:

A. Notwithstanding any provision of law to the contrary, any department or agency of the Government of the United States which administers any Act of Congress which specifically provides for making grants to any Insular Area under which payments received may be used by such Insular Area only for certain specified purposes (other than direct payments to classes of individuals) may, acting through appropriate administrative authorities of such department or agency, consolidate any or all grants made to such area for any fiscal year or years.

B. Any consolidated grant for any Insular Area shall not be less than the sum of all grants which such area would otherwise be entitled to receive for such year.

C. The funds received under a consolidated grant shall be expended in furtherance of the programs and purposes authorized for any of the grants which are being consolidated, which are authorized under any of the Acts administered by the department or agency making the grant, and which would be applicable to grants for such programs and purposes in the absence of the consolidation, but the Insular Areas shall determine the proportion of the funds granted which shall be allocated to such programs and purposes.

D. Each department or agency making grants-in-aid shall, by regulations published in the Federal Register, provide the method by which any Insular Area may submit

    a. a single application for a consolidated grant for any fiscal year period, but not more than one such application for a consolidated grant shall be required by any department or agency unless notice of such requirement is transmitted to the appropriate committees of the United States Congress together with a complete explanation of the necessity for requiring such additional applications and

    b. a single report to such department or agency with respect to each such consolidated grant: Provided, That nothing in this paragraph shall preclude such department or agency from providing adequate procedures for accounting, auditing, evaluating, and reviewing any programs or activities receiving benefits from any consolidated grant. The administering authority of any department or agency, in its discretion, may (i) waive any requirement for matching funds otherwise required by law to be provided by the Insular Area involved and

    c. waive the requirement that any Insular Area submit an application or report in writing with respect to any Consolidated Grant.

(48 U.S.C. 1469a) Enacted Oct. 15, 1977. P.L. 95-134. Sec. 501. 91 Stat. 1164. 1165) For more information, visit this page.

3.3: Grants Administration Contact Information

The ASDOE Federal Grants Management Office Administration can be reached at

Phone number: 684-633-1026/1027

Email: asdoe.federalgrantsoffice@doe.as

Website: https://www.doe.as

Address:Utulei, Pago Pago, AS 96799

4: Types of Grants

ASDOE administers two types of grants: *formula grants and discretionary grants.*

A *formula grant* is a type of mandatory grant awarded based on a formula or set of criteria for specific types of work that is typically outlined in legislation or regulation. The Consolidated Grant is one example of a formula grant. Grantees do not compete for formula grants; although grantees are required to complete grant applications and comply with grant requirements to ensure that funds are used to meet the purpose and goals of the grant program. In education, recipients of formula grants are state or local education agencies (SEA - Director) or LEAs (ASDOE Divisions/Offices) and grant funds are disbursed based on a mathematical formula defined in legislation. This formula accounts for the LEA's population, among other factors.

A *Discretionary grant* programs award funds using a competitive process. The Department solicits applications and bses its review on legislative and regulatory requirements as well as published selection criteria established for a program. The review process enables the Department to determine which applications best address the program requirements and are, therefore, most worthy of funding.

5: Consolidated Grant Information

5.1 Overview of the Consolidated Authority

The Consolidated Grant for the Insular Areas is authorized under 48 U.S.C 1469a. Regulations about these grants are in 34 CFR 76.125-76.137 of the Education Department General Administrative Regulations (EDGAR). This authority allows the Insular areas to apply for one or more eligible State-administered formula grant programs under one Consolidated Grant application. The Insular Areas are American Samoa, the Commonwealth of the Northern Mariana Islands, Guam, and the U.S. Virgin Islands. The Insular Areas submit one application - every three years - for any two or more authorized formula grant programs eligible for consolidation.

5.2 Purpose of the Consolidation Authority

The Consolidated Grant aims to streamline administrative procedures and offer flexibility in fund allocation, enabling Insular Areas to achieve program goals effectively. While competition for funds is eliminated, compliance with grant requirements ensures proper fund utilization.

5.3 Programs Eligible for Consolidation

Insular Areas can consolidate funds from various eligible State-administered formula grant programs, including those addressing educational needs like LEA Grants, State Assessment Grants, and Student Support Grants. These programs, administered by OESE and OCTAE, cater to diverse educational initiatives within Insular Areas.

---

a. Title I, Part A – Local Educational Agency (LEA) Grants (Title I-A);
b. Title I, Part B – State Assessment Grants (Title I-B);

c. Title II, Part A – Supporting Effective Instruction State Grants (Title II-A);

d. Title III, Part A – English Language Acquisition State Grants (Title III-A);

e. Title IV, Part A – Student Support and Academic Enrichment Grants (SSAE)
f. Title IV, Part B – 21st Century Community Learning Centers (Title IV-B); and
g. Title V, Part B, Subpart 2 – Rural and Low-Income School Program (RLIS).

The eighth program OESE administers is the Education for Homeless Children and Youth Grants (EHCY), authorized by the McKinney-Vento Homeless Assistance Act (McKinney-Vento).

The ninth program, the Career and Technical Education-Basic State Grants Program is authorized by the Carl D. Perkins Career and Technical Education Act of 2006, as amended by the Strengthening Career and Technical Education for the 21st Century Act (Perkins V), and is administered by the Office of Career, Technical, and Adult Education (OCTAE).

5.4 Consolidated Grant Award Amount

The Consolidated Grant amount is determined by summing up the allocations received under each eligible Federal grant program included in the application. Insular Areas must specify fund allocation among programs to ensure compliance with grant regulations.

> h. 76.131(c)(1) - An Insular Area must identify how funds, including any anticipated carryover funds from the preceding year
>
> i. 76.131(c)(4) - Will be allocated among the Federal programs included in its application.

5.5 Carryover Funds (Tydings Period)

The statutory authority for the period for obligating carryover funds is known as the "Tydings Period." In general, under this provision, any funds not obligated and extended during the period they were awarded become carryover funds and may be obligated and expended during the succeeding fiscal year. As specified in section 421(b)(2) of GEPA and EDGAR 76.710, any such carryover funds must be obligated and expended in accordance with the Federal statutes and regulations that apply to the program and are in effect for the carryover period, as well as the program plan or application submitted and in effect for the carryover period.

5.6 Uses of Funds

An Insular Area must utilize funds received through a Consolidated Grant solely for eligible programs included in the consolidation. It is imperative for the Insular Area to adhere to all statutory and regulatory requirements governing the implementation of these programs. Ensuring that officials and staff are well-versed in relevant statutory and regulatory obligations, both programmatically and fiscally, is essential.

Furthermore, when utilizing funds from the Consolidated Grant, the Insular Area must guarantee that non-Federal funds are not replaced by Federal funds from the grant. This underscores the supplementary nature of Consolidated Grant funds, emphasizing that the Insular Area should not reduce State or local funding for specific activities solely due to the availability of Consolidated Grant funds.

5.7 Consolidated Grant Application

The Consolidated Grant Application is an annual submission to the US Department of Education (USDOE) for review and approval. Once received, it undergoes scrutiny within the ASDOE Internal Process, focusing on the feasibility of proposed CG Project goals, objectives, and activities. This application comprises of three interconnected forms: the Project Narrative, Means of Evaluation (MOE), and Budget Narrative. An additional document is required for Year 2 and Year 3 of the CG-3 year cycle. This form is called the Submission Form; and the form identify any changes or modification on project activities from Year 1.

Responsibility for managing this process lies with the Federal Grants Management Office (FGMO). The FGMO oversees training sessions, edits, reviews, and establishes deadlines. Subsequently, the FGMO submits the completed ASDOE application to the USDOE.

The FGMO initiates several procedural steps to ensure timely and compliant submission:

1. The FGMO Manager collaborates with the ASDOE Director to assess the previous cycle's performance and offer recommendations, as reflected in the Annual Performance Report.
2. An introductory meeting convenes all Project Leads and FGMO to align project objectives with student needs and stakeholder feedback, utilizing data to inform project activities for students and teachers. The information also includes the following:
   a. Emphasize on the need to align goals, objectives, and performance targets.
   b. Provide update on indirect costs when completing budget narrative to make sure that Project Leads follow the allocated indirect cost provided by Treasury Department.
   c. A short demonstration of how to determine the indirect costs for all projects under CG
3. Technical assistance for new cycle CG applications is extended by the FGMO.
4. Upon receipt of an email confirmation from the USDOE, detailing the new application format and deadline. The Finance Team reaches out to the AS Treasury to provide an updated confirmation on the indirect cost before a new budget narrative is established by each Project Lead. Further assistance is provided by Grant Analyst during one-in-in consultation with the Project Leads.
5. FGMO sets deadlines for submission of proposals to individual projects funded under CG, ensuring compliance and timely submission while leveraging data insights to optimize project effectiveness.

6: ASDOE-FGMO Program Management

6.1 Internal Process for reviewing the allowability of proposed CG activities

During annual Technical Assistance Training by the FGMO for all Project Leads and ASDOE Administration, a list of updated allowable activities are provided by the FGMO to guide the Project Leads in reviewing allowable activities for specific projects. First, a list of Programs Titles are provided with specific explanations of

the role and functions of these title programs. After, a list of sample allowable activities is provided for PL to follow through.

1. Title I, Part A - Local Educational Agency (LEA) Grants (Title I-A)

Key Details:

- Supports local educational agencies (LEAs) in providing academic courses not typically available at a student's school.
- Includes advanced courses and career and technical education (CTE) coursework aligned with state academic standards.
- Offers credit recovery and academic acceleration courses leading to a regular high school diploma.
- Assists students in successfully completing postsecondary level instruction and examinations, including Advanced Placement and International Baccalaureate courses.
- May cover part or all of the costs of fees for such examinations for low-income students.
- Supports components of a personalized learning approach, including high-quality academic tutoring.
- Aims to improve academic achievement among disadvantaged students.
- Requires LEAs to use funds to supplement, not supplant, existing resources.
- Emphasizes evidence-based strategies to enhance educational outcomes.

2. Title II, Part A - Supporting Effective Instruction State Grants (Title II - A)

Key Details

- Reforming teacher, principal, or other school leader certification, recertification, licensing, or tenure systems or preparation program standards and approval processes to ensure that teachers have the necessary subject-matter knowledge and teaching skills, as demonstrated through measures determined by the State, which may include teacher performance assessments, in the academic subjects that the teachers teach to help students meet challenging State academic standards;
- Developing, improving, or providing assistance to local educational agencies to support the design and implementation of teacher, principal, or other school leader evaluation and support systems that are based in part on evidence of student academic achievement, which may include student growth, and shall include multiple measures of educator performance and provide clear, timely, and

useful feedback to teachers, principals, or other school leaders, such as by—
- developing and disseminating high-quality evaluation tools, such as classroom observation rubrics, and methods, including training and auditing, for ensuring inter-rater reliability of evaluation results;
- developing and providing training to principals, other school leaders, coaches, mentors, and evaluators on how to accurately differentiate performance, provide useful and timely feedback, and use evaluation results to inform decisionmaking about professional development, improvement strategies, and personnel decisions; and
- developing a system for auditing the quality of evaluation and support systems.

- Improving equitable access to effective teachers
- Carrying out programs that establish, expand, or improve alternative routes for certification of teachers
- Developing, improving, and implementing mechanisms to assist local educational agencies and schools in effectively recruiting and retaining teachers, principals, or other school leaders
- Developing, or assisting local educational agencies in developingcareer opportunities, advancement initiatives to improve classroom instrucon and increase the retention of effective teachers.
- Providing assistance to local educational agencies for the development and implementation of high-quality professional development programs for principals that enable the principals to be effective and prepare all students to meet the challenging State academic standards.
- Supporting efforts to train teachers, principals, or other school leaders to effectively integrate technology into curricula and instruction
- Reforming or improving teacher, principal, or other school leader preparation programs, such as through establishing teacher residency programs and school leader residency programs.
- Establishing or expanding teacher, principal, or other school leader preparation academies
- Supporting the instructional services provided by effective school library programs.
- Developing, or assisting local educational agencies in developing, strategies that provide teachers, principals, or other school leaders with the skills, credentials, or certifications needed to educate all students in postsecondary education coursework through early college high school or dual or concurrent enrollment programs.
- Providing training for all school personnel, including teachers, principals, other

school leaders, specialized instructional support personnel, and paraprofessionals, regarding how to prevent and recognize child sexual abuse.

- Supporting opportunities for principals, other school leaders, teachers, paraprofessionals, early childhood education program directors, and other early childhood education program providers to participate in joint efforts to address the transition to elementary school, including issues related to school readiness.
- Developing and providing professional development and other comprehensive systems of support for teachers, principals, or other school leaders to promote high-quality instruction and instructional leadership in science, technology, engineering, and mathematics subjects, including computer science.
- Supporting the professional development and improving the instructional strategies of teachers, principals, or other school leaders to integrate career and technical education content into academic instructional practices, which may include training on best practices to understand State and regional workforce needs and transitions to postsecondary education and the workforce.
- Supporting and developing efforts to train teachers on the appropriate use of student data to ensure that individual student privacy is protected as required by section 444 of the General Education Provisions Act (commonly known as the "Family Educational Rights and Privacy Act of 1974") (20 U.S.C. 1232g) and in accordance with State student privacy laws and local educational agency student privacy and technology use policies.
- Supporting other activities identified by the State that are, to the extent the State determines that such evidence is reasonably available, evidence-based and that meet the purpose of this title.

3. Title III, Part A - English Language Acquisition State Grants (Title III-A)

Key Details

- Establishing and implementing, with timely and meaningful consultation with local educational agencies representing the geographic diversity of the State, standardized statewide entrance and exit procedures, including a requirement that all students who may be English learners are assessed for such status within 30 days of enrollment in a school in the State.
- Providing effective teacher and principal preparation, effective professional development activities, and other effective activities related to the education of English learners
- Providing technical assistance and other forms of assistance to eligible entities

that are receiving subgrants from a State educational agency

4. Title IV, Part A - Student Support and Academic Enrichment Grants (SSAE)
Key Details

- Increasing student access to and improving student engagement and achievement
- postsecondary level courses accepted for credit at institutions of higher education, including dual or concurrent enrollment programs, and early college high schools; or
- postsecondary level instruction and examinations that are accepted for credit at institutions of higher education, including Advanced Placement and International
- Foster safe, healthy, supportive, and drug-free environments that support student academic achievement, as described in section 4108, which may include—
- supporting local educational agencies to implement mental health awareness training programs that are evidence-based
- expand access to or coordinate resources for school-based counseling and mental health programs, such as through school-based mental health services partnership programs;
- increase access to personalized, rigorous learning experiences supported by technology
- disseminating promising practices related to technology instruction, data security, and the acquisition and implementation of technology tools and applications, including through making such promising practices publicly available on the website of the State educational agency;
- providing teachers, paraprofessionals, school librarians and media personnel, specialized instructional support personnel, and administrators with the knowledge and skills to use technology effectively, including effective integration of technology, to improve instruction and student achievement, which may include coordination with teacher, principal, and other school leader preparation programs; and
- making instructional content widely available through open educational resources, which may include providing tools and processes to support local educational agencies in making such resources widely available.

5. Title IV, Part B - 21st Century Community Learning Centers (Title IV-B)
Key Details

- Provide opportunities for academic enrichment, including providing tutorial

services to help students, particularly students who attend low-performing schools, to meet the challenging State academic standards;

- Offer students a broad array of additional services, programs, and activities, such as youth development activities, service learning, nutrition and health education, drug and violence prevention programs, counseling programs, arts, music, physical fitness and wellness programs, technology education programs, financial literacy programs, environmental literacy programs, mathematics, science, career and technical programs, internship or apprenticeship programs, and other ties to an in-demand industry sector or occupation for high school students that are designed to reinforce and complement the regular academic program of participating students; and
- Offer families of students served by community learning centers opportunities for active and meaningful engagement in their children's education, including opportunities for literacy and related educational development.

6.2 CG Application Format and Process:

Prior to the start of a new application, the FGMO meets with all project leads to go over the new application templates. Updated data are shared to provide a needs assessment for CG on-going projects. Each project lead shared data based on various surveys from stakeholders (students, parents, teachers, school-support staff, ASDOE Personnel, E-Rate, PTA, Community, ASDOE 5-Year Implementation Plan, ASG Externals, etc…) students performance (assessment, graduation rate, absenteeism, safety, etc…) to make informed decisions on why these projects are vital for the progress of ASDOE in meeting its Mission and Vision.   Project Leads submit applications to FGMO; each Grant Analyst is responsible for the review and editing of the Project and MOE Application contents. Below is the process and procedure for filling out the application requirements. Further reviews are based on the following criteria/checklist:

6.2.1 *Project Narrative & Means of Evaluation (MOE)*

☐ Follow the correct format Fill in all information provided in the application
☐ Project Title - Enter the name of the project
☐ Identify the number and whole name of the project. For example: Project 2: Teacher Quality
☐ Identify the title and program and allowable uses of funds
☐ List down the types of programs that are relevant to the project For example: Teacher Quality - ESEA Title V, Part B, Subpart 2 - RLIS SEA or LEA Services:

☐ Identify which services are provided. Suggestion - Most projects should fall under "LEA"

☐ Population and Numbers to Receive Services. Make sure to fill in the box with the correct information on

☐ Grade Levels, Number should always reflect K5-12 (OSEA)

☐ Number of Students, Should reflect an accurate number of students being served under this project

☐ Participant Types - Participants can be in the form of teachers, school administrators, other staff, and parents

☐ Number of Participants - Accurate number of participants involved in the program, breakdown by type

☐ Needs for Project - Identified need for this project. Data should be updated and relevant and should reflect the needs of students and teachers

☐ Explanation of how project activities connect to the need for this project - Provide a clear description of the connection of the activities to the needs for the project

☐ Goal Statement and Objectives - State one main goal for this project to achieve during the 3-year grant cycle. Explain how the goal will meet the project's needs

☐ Annual Objectives - List the annual objectives for each year in the application cycle. There should be one annual objective for each year, which means a total of 3. Each of these 3 annual objectives should be aligned to the project goal statement. Explain in what ways each objective will support accomplishing the main project goal. Make sure that each objective is SMART

☐ Project Description - Basic Program of Instruction. Describes the basic program of instruction, which is a set of common courses required of all students and considered the necessary general education for students, irrespective of their course of study. List how the Basic Program of Instruction is related to the project need.

☐ Supplemental Project and management - List the projects that will be implemented within this CG project and explain how the projects are supplemental to the Basic Program of Instruction. State why the proposed project is necessary to meet the project's needs.

☐ List the major activities to be implemented that will assist with the attainment of the project's goal. The list must also include an estimated timeline and the person's responsibility. Identify when and where will the activities be implemented. Mention any potential connection to any other Federal Agencies, if No connection just state "No Connection"

☐ Personnel Needs - List the federally funded positions necessary to implement this project. Provide a brief description of the position and how the positions

support the project's goals. Indicate the amount of time, such as hours or percentage of time, to be expanded by each position under this project.

Means of Evaluation Worksheet

☐ Project Title - Identify the title and make sure that it matches the title on the project narrative

☐ Means of Evaluating Program Outcomes Chart - Amount of charts to cover all activities

☐ Project Activity - Identify the activities covered by this project. Make sure that the activity reflects the objectives of the project

☐ Corresponding Annual Objective - Enter the annual objective that aligns with the activities

☐ Data Source - Write down where the data are located and where the data will come from

☐ Unit of Measurement - Enter the unit of measurement

☐ Evidence Based - Is this activity evidence-based? Yes or No

☐ Baseline Data - Starting baseline data to be used to measure the progress of the project. If not available, indicate when data will be available.

☐ Performance Target - Focus on outcomes rather than outputs. Quarter Outcomes

6.2.2 Budget Narrative -Must demonstrate alignment with the corresponding Project narrative. Show a clear alignment to the proposed budget and explain how the budget for the supplemental project supports the achievement of the project's identified goals. All budget costs must be allowable. They must be necessary and reasonable, allocable to the program, and adequately documented. They should be clearly aligned with the project narrative.

☐ Project Title - Identify the title of the project

☐ Personnel Salaries, Wages, & Fringe Benefits - Enter project personnel salaries, wages, fringe benefits, and direct costs. List the title and purpose of each position to be compensated under this project. Explicitly explain how each personnel salary and fringe benefit aligns with the project narrative and supports the project's goal in the "Purpose of Position" Enter the amount of time, such as hours or percentage of time to be expended by each position under this project.

☐ Travel - List the travel activities and costs of employees and participants only. Explicitly explain the purpose of the travel activity and how each travel activity supports the project's goal in "Purpose of Travel Activity" section. List travel expenses for participants to attend the CG Technical Assistance Meeting in the

Washington D.C. area if it is not virtual. Provide an itemized budget breakdown of travel costs. Calculate and enter the total cost for each travel activity for current CY

☐ Equipment: Is defined as tangible personal property having a useful life of more than one year and a per-unit acquisition cost which equals or exceeds the lesser of the capitalization level established by the non-Federal entity for financial statement purposes. List each type of equipment. Describe the purpose of each piece of equipment and how it supports the project's goal in the "Purpose of Equipment" section. Provide the estimated unit cost for each item to be purchased. Calculate and enter the total cost for each equipment purchase for the current FY

☐ Supplies: This is defined as tangible personal property other than those described in equipment. Any items that cost less than $5,000 should be considered a supplies expense. List materials and supplies by nature of expenses or general category. Provide an itemized budget breakdown of costs for materials and supply items. Calculate and enter the total cost for each supply purchase for the current FY

☐ Contractual (Purchased Services). Include all costs specifically incurred with actions that the applicant takes in conjunction with an established internal procurement system. Include consultant fees, expenses, and travel costs in this category if the consultant's services are obtained through a written binding agreement or contract. Briefly explain the purpose of each contractual project or service and how it supports the project's goal in the "Purpose of Service" section. Identify the products to be acquired or professional services to be provided. Provide an itemized budget breakdown of costs for the deliverables under each contract. Calculate and enter the total cost for each contract for the current FY

☐ Other Direct Costs - Identify all direct costs not previously covered in the other budget categories. List and identify items by major type of categories. Explicitly explain the purpose for each direct cost item and how it supports the project's goal in the "Purpose of Direct Cost Item" section. Provide an itemized budget breakdown of costs per item. Calculate and enter the total cost for each other direct cost purchase in the current FY

6.2.3 Submission Form

☐ Continuing Project(s) - Projects from Year 1 full application package that is being implemented without any changes

☐ Modified Project(s) - Project(s) from Year 1 full application package that is changed in some way. Submit updated project and budget narrative reflecting either deleted or added sections

☐ New Project(s) - Project(s) that is completely new and was not part of Year 1 application package. Submit Project and Budget Narratives. Submit MOE

☐ Discontinued Project(s) - Project(s) that were in the Year 1 application package, but are no longer being implemented

B. After a thorough review of the whole application, the FGMO Manager submits the application online, following instructions from the grantors.
C. The FGMO awaits the feedback from the grantors. During that time, the FGMO relayed the information back to the Project Leads for correction. If it's time-sensitive, the FGMO makes the needed revision and submits it back to the grantor for final approval.
D. Once the new cycle CG application is approved, the USDOE representative contacts the Director of Education and the FGMO Manager to inform them of the Grant Award Notification (GAN) and stipulation of the grant.
E. The FGMO Team sends out copies of the approved Project Narrative, MOE, and Budget Narrative to individual Project Leads.

6.3 Grant Award Notification (GAN)

Once the ASDOE received notification of award, the FGMO shares the GAN to Finance Office.ASDOE Finance Office is reposponsible for getting the information out to the external partners; the ASG Budget Office and ASG Treasury Office to create accounts and set up an expenditure tracking system for all departments to follow through. The FGMO and ASDOE Finance Office work together to create accounts for all CG-approved projects and funding.

6.3.1 Finance Office - shared the Budget narrative with the ASG Treasury Office to create accounts for each specific Project approved under Consolidated Grant

6.3.2 Budget Office - Budget Analysts reviewed the BUD 202's from the ASDOE - Finance Divison. Once all required documents are in order, the BA submits the forms to Budget Director for review and signature. The last step is to have the Finance Office picks up BUD 202 and route it out to Treasury.

6.3.3 Treasury Department - The Grant Analyst from the Treasury does a final review of the BUD 202's. Once it's complete, the GA assign grant account and numbers and uploaded those new accounts in the One-Solution Accouting

system Updated new information in the One-Solution system to track the expenditure report for the allowable usage of funds under CG

More explanation is provided in the following flow-chart below that illustrates the checklist for new grant awards:

FLOW CHART AND CHECK LIST FOR NEW GRANT AWARDS

NEW GRANT AWARD REQUIREMENTS - Initiated by ASG Department

BUD 202 FORM & required documents:
❖ Grant Award Notice (GAN)
❖ State Plan including Special Conditions.
❖ Budget Narrative & Budget detail plan.

BUD 202 must match the GAN.

BUD 202 for DOI & CIP Grant Awards must be initialed by Lydia Nomura before submitting to BUDGET OFFICE.

CIP BUD 202's are routed to Special Program/CIP Office on the 2nd Floor of EOB before submitted to Budget Office.

ASG - DEPARTMENT CHECK LIST:

BUD 202 FORM - completed and signed by Director

GRANT AWARD NOTICE - GAN

STATE PLAN & SPECIAL CONDITIONS

BUDGET NARRATIVE AND BUDGET DETAIL PLAN

BUDGET OFFICE

1. BUD 202's & required documents are reviewed by Budget Analyst.

2. Budget Analyst submits to Budget Director for review & signature.

3. Department picks up BUD 202 & route to Treasury.

TREASURY

1. Review by Grant Analyst

2. Grant account/number is assigned

3. BUD 202 uploaded in IFAS System.

REPROGRAMMING OR REVISIONS OF GRANT AWARD

BUD 202 revisions for reprogramming follows the same flow chart

BUD 202 revisions for reprogramming requires supporting documentations

Reprogramming of approved cost centers is allowed based on the speical conditions & approved budget narrative/details

Reprogramming of cost centers not approved in the award requires a grantor approval

Reprogramming of RESTRICTED GRANTS requires grantor approval

Provided By: OFFICE OF PROGRAM, PLANNING AND BUDGET

6.3.3 ASG Indirect Cost Proposal (AS Treasury SOP)

1. Run GL detail reports by total for the following object code clusters: 5111-5113, 5114-5199 and 5200-5999. Sort by org key.
2. Transfer gl detail data to Excel. Match all three clusters by org key. Calculate overall total for each org key.
3. Fill in Fund, Function and Org Key description for each org key.
4. Group data by fund and function. Groupings should match financial statements.
5. Once data matches, insert data into Indirect Cost Allocation template. All formulas are preset to calculate indirect cost rates.

6. Use reconciliation worksheet to make sure there are no variances between detail data, financial statements and calculations.
7. Prepare the following attachments that accompany the Indirect Cost Allocation proposal:
   a. IDC Proposal Cover Letter
   b. IDC Proposal Table of Contents
   c. IDC Proposal Checklist
   d. IDC Certification of Costs
   e. Accounting System Description
   f. IDC Department Justifications
   g. US Fish & Wildlife Service Final Appropriation of Pittman-Robertson
   h. US Fish & Wildlife Service Final Appropriation of Dingell-Johnson
   i. ASG Financial Statements
8. Once the Treasurer signs the cover letter and certification of costs, scan all documents and email to Indirect Cost Group Services at ics@ibc.doi.gov. A copy of the indirect cost allocation proposal should also be emailed to USDOE.
9. ICS will assign a negotiator to work with ASG Treasury in reviewing proposal.
10. Once review is complete, ICS will propose indirect costs rates for DOE Unrestricted and Other. ICS will contact USDOE for their rate for DOE Restricted.
11. ICS will prepare the negotiated agreement for the ASG Treasure to review and sign (via e-signature) if he approves.
12. ICS will send the official indirect cost rates.
13. ASG Treasury will disseminate to all ASG departments and agencies.

6.3.4: Indirect Cost discussion with Project Leads

To effectively manage and communicate indirect costs within the American Samoa Department of Education (ASDOE), the Federal Grants Management Office (FGMO) engages in several practices to ensure transparency and compliance:

1. Early Discussions: The dialogue concerning indirect costs between the FGMO and Project Leads initiates in the early stages of the Consolidated Grant (CG) Application process. This proactive approach ensures that all parties are aware of the financial parameters from the outset.
2. Training Sessions: During the training sessions for Project Leads, the FGMO Manager provides detailed information on indirect cost rates. This ensures that Project Leads have a clear understanding of how to apply these rates to their project budgets effectively and not to exceed the rate applied.

3. Dissemination of Rate Memos: Prior to the submission of their CG Budget Applications, Project Leads receive a copy of the Restricted Rate Memo from the AS Treasury.
4. Regular Updates: The FGMO ensures that Project Leads are kept informed about any changes or updates to indirect cost rates, facilitating adaptive financial planning and compliance with current guidelines.
5. One-on-One Consultations: To further support Project Leads in their budgeting process, the FGMO offers individual consultations. These sessions allow for personalized guidance, ensuring that the application of indirect costs is both accurate and tailored to the specific needs of each project.

These practices demonstrate ASDOE's commitment to ensuring that Project Leads are well-informed and supported in applying indirect cost rates, ultimately contributing to the efficient and compliant financial management of grant funds

6.3.5: Carryover Funds

1. Purpose

This document outlines the internal control procedures implemented by the American Samoa Department of Education (ASDOE) to ensure thorough documentation and compliance with grant requirements for CG carryovers.

2. Identification of Carryover Funds
- Regular Review: The Finance Office conducts regular reviews of grant balances to identify any unspent funds nearing the end of the grant period.
- Communication with Project Leads: Project leads are informed of any remaining unspent funds and are advised on the process for requesting carryover if necessary.

3. Documentation Process
- Request Submission: Project leads submit carryover requests to the Federal Grants Management Office (FGMO), including detailed justifications for the necessity of carryover funds and how they align with the original grant objectives.
- Review and Approval: The FGMO reviews carryover requests to ensure they meet grant requirements and align with approved project activities. Approval is granted by designated authorities within ASDOE.
- Documentation Retention: Approved carryover requests, including justifications and approval documentation, are retained electronically and in hard copy for auditing purposes.

4. Compliance with Grant Requirements
- Alignment with Use of Funds Requirements: The FGMO verifies that carryover funds are used in accordance with grant requirements, ensuring they support allowable activities outlined in the grant agreement.

- Monitoring and Reporting: Project leads are responsible for monitoring the use of carryover funds and providing regular updates to the FGMO on their utilization. The FGMO includes information on carryover expenditures in grant reports submitted to grantor agencies.

5. Annual Reports and Tydings Period

- FFR Completion: The Fiscal Officer completes the Federal Financial Report (FFR) within 120 days after the performance period ends and submits it to the ASDOE Chief Finance Officer (CFO) for approval.
- Carryover Balances Determination: Carryover balances are determined at the end of the budget period date. Unobligated funds balance from each project after this date is carried over for the next 12 months during the Tydings period.
- Budget vs Actual Report: The Finance staff runs the budget vs actual report on the One Solution accounting system for the end date of each federal funding period.
- Report Distribution: The report is forwarded to the FGMO and Project Leads to make them aware of unobligated balances for each project.
- Leadership Reporting: All financial reports, including carryover balances, are shared with leadership upon request.
- GAN Obligation Dates: Budget and Treasury ensure that obligation dates are set in accordance with the Grant Award Notification (GAN).
- Tydings Amendment: Any funds not obligated at the end of the federal funding period specified in the GAN remain available for obligation for an additional period of 12 months, as per the Tydings Amendment.

By implementing these internal control procedures, ASDOE ensures that all CG carryovers are well-documented, adhere to grant requirements, and are utilized efficiently, promoting transparency, accountability, and compliance with funding regulations.

6.4 ASDOE - FGMO Grant Cycle Outline

Once the GAN is shared with the ASDOE, the FGMO shares approved CG Narratives with all parties that are involved in the Grant Application. In addition, an annual schedule is shared on the ASDOE website and emailed to all ASDOE Personnel involved in the CG. The annual schedule provides dates for Quarterly meetings, submission of quarterly reports by project leads, and site visitation schedules. The annual schedule is provided below:

1. **January - First Quarter (October, November, December)**
   a. Initial Meeting
   b. First Quarter Report

c. Site Visitation
d. Follow-up report
e. New-Cycle Application
    i. Technical Assistance
    ii. Due dates
    iii. Review and Revisions

2. **April - Second Quarter (January, February, March)**
    a. Second meeting/training
    b. Second Quarter Report
    c. Site Visitation
    d. Follow-up report

3. **July - Third Quarter (April, May, June)**
    a. Technical assistance/meeting
    b. Third Quarter report and follow-up

4. **October - Fourth Quarter (July, August, September)**
    a. End of the FY meeting and follow-up
    b. Fourth Quarter Report
    c. Collect FY Data and Evidence

5. **December - Annual Performance Report**
    a. Report submitted to USDOE

6.5 FGMO Technical Assistant Training (Internal)

Under FGMO Guidelines and stipulations, there should be a comprehensive Federal use of funds training plans for all project leads. This training plan is implemented twice a year, annually. The first training is in February which covers the new cycle application year submission and immediately after the first quarter reports are reviewed and approved. This training will cover all allowability under all authorized programs whose funds are included in Consolidated Grants. The final training will be done in November. This training will address any questions from Project Leads, and issues concerning reviews and reports by FGMO, and occurs after the submission of the 4th quarter annual reports. In addition, this final training will assist with putting together the Annual Performance Report submitted to the USDOE for the final review of CG projects under ASDOE.

Technical Assistance Training will include all ASDOE Divisions that are responsible for the management and oversight of all federal funds; primarily the FGMO, Finance Office, Personnel Office, and Business Office. In addition, ASDOE Leaders/Administrators will also be involved to understand the process, policies, and procedures of grants, but more importantly offer support and emphasize the importance of following protocols.

6.5.1. One-Solution Accounting System

The whole ASG relies under the One-Solution Accounting System for financial reporting and documentation. This system is operated by the AS Treasury who provide access to all ASG Departments that have funding (local and grants) to check and monitor the use of funds. In ASDOE, only a few divisions are allow accessibility privileges depending on role and task that assist the AS Treasury. The Business division can access the system to input Purchase Requisition Numbers, the Director provide his approval online, and FGMO only have view access. Every week FGMO Grant Analysts send out Budget Position reports to Project Leads for accountability and updates on the current status of ongoing projects. During FGMO Technical Trainings, Project Leads are given a refresher course in understanding how to read the report provided to them weekly. Below is a chart that illustrates the system, system approval and information breakdown provided to Project Leads during Technical Assistance Training.

ONESolution SYSTEM

BUDGET POSITION REPORT

American Samoa Government Report
Year to Date
Budget Position Report
For Month Ending 2/29/2024

Department 0600 - Education

PERIOD OF PERFORMANCE

20   ACCOUNT #   PROJECT NAME   Key Status:A Key Start/End Dts: 7/1/2020   END DATE 9/30/2022
ITD Key? Y

Prime	Description	Type	ITD	WK Budget	Actual	Encumbrance	Balance
4300	Intergovernmental Revenue	RV	Y	0.00	837,567.49	0.00	-837,567.49
5100	Personnel Services	XP	Y	729,439.30	733,912.41	0.00	-4,473.11
5200	Supplies and Expenses	XP	Y	313,401.60	12,407.79	0.00	300,993.81
5400	Travel	XP	Y	14,855.00	14,795.00	0.00	60.00
5900	Indirect Cost	XP	Y	75,804.15	76,452.29	0.00	-648.14

Total							
	Revenue			0.00	837,567.49	0.00	-837,567.49
	Expenditures			1,133,500.05	837,567.49	0.00	295,932.56

APPROVAL STATUS

American Samoa Gov't
Workflow User Performance

Instance: PR: PR61751~ PO: ~ Vend: TBD~ Stat: PR
Model ID: PR_APPROVAL

Version	Life	Change	User ID	Days		Activity	Dates on Tasklist	Comments
35	1	1						
			JTUIASOS(	1		A53_0009	12/15/2022 - 12/16/2022	
			SAMASON	4	Includes Weekend	A52_0007	12/16/2022 - 12/20/2022	
			GFANO	20	Includes Weekend	A59_0013	12/20/2022 - 1/9/2023	Obsolete - Action taken by AMELIA
			AMELIA	0		A59_0013	1/9/2023 - 1/9/2023	
			KARAL	0		A32_0005	1/9/2023 - 1/9/2023	
			AOKUSOS	0		A33	1/9/2023 - 1/9/2023	
			JTUIASOS(	77	Includes Weekend	A53_0010	1/9/2023 - 3/27/2023	
			SAMASON	10	Includes Weekend	A52_0008	3/27/2023 - 4/6/2023	
			PEARLF	197	Includes Weekend	A47_0017	4/6/2023 - 10/20/2023	
			SASIATA	95	Includes Weekend	A59_0014	10/20/2023 - 1/23/2024	Obsolete - Action taken by AMELIA
			AMELIA	95	Includes Weekend	A59_0014	10/20/2023 - 1/23/2024	
				499				
35	1	2						
			KARAL	1		A32_0005	2/12/2024 - 2/13/2024	
			CATHYS	2		A20	2/13/2024 - 2/15/2024	
			PEARLF	12	Includes Weekend	A47_0012	2/15/2024 - 2/27/2024 Pending	
				15				

514 Days so far.

6.6 ASDOE-FGMO Schedule:

(Yearly Technical Training, Mandatory Meetings, and Site Visitations) FGMO operates on a yearly basis scheduled for the management, reporting, and conducting of site visitations for Consolidated Grant. Below is an overview of the annual schedule.

ASDOE-FGMO YEARLY CALENDAR	
Month	Activities
January	First Quarter Report Due
	FGMO-1st Quarter Meeting
	Grant Analyst & Project Lead meet
	Site Visitation - Collect evidence & Data
	First Quarter Meeting with USDOE
	Liquidation Deadline
	Consulation Period with Private Non-Public School
February	ASDOE Internal Technical Assistance Training

	Follow-up report from January
	Next cycle full Application training
	Project Lead Individual Training
March	Remind Project Leads for 2nd quarter report submission
	Grant Analyst review of Project & Budget Narrative
	Project Leads submit changes and complete revisions on CG Application Drafts to FGMO
	Second Quarter Meeting with USDOE
April	Second Quarter Report Due
	FGMO-2nd Quarter Meeting & Site Visit
	Grant Analyst & Project Lead meet
	Site Visitation - Collect evidence & Data
	Submit New Cycle CG-Application
	Deadline for submitting request by PL
	Obligation deadline for PL Requisitions
May	Work on edits and revisions from USDOE
	Finalize CG applications and provide update to Director
	Deadline for submitting request by PL
	Third Quarter Meeting with USDOE
June	Remind Project Leads on 3rd Quarter reports due date
	Grant Analyst updates FGMO Manager on CG-project
	Provided updated expenditure reports to Project Leads for 3rd quarter
	CG New Application Revisions

July	Third Quarter Report due
	FGMO 3rd Quarter Meeting
	Grant Analyst and Project Lead meeting
	Site visitation
	Fourth Quarter meeting with USDOE
August	Set-Up accounts for new projects
	Send new project, MOE, and Budget narratives to Project Leads (based on approval timeline)
September	Remind Project Leads for 4th Quarter reports
	Reminder for Project Folder of Evidence for whole year
	Obligation Period for current year (GAN)
October	Submit 4th Quarter Report
	Meetings with Project Leads
	Site visitation to all CG projects
	Final meeting with USDOE - 4th quarter
	Data Collection (ALL PROJECTS)
November	2nd Annual ASDOE Internal Control Training
	Project Leads submit folder of evidence for CG Project
	Prepare report for Annual Performance Report

December	Submit Annual Performance Report
	Submit FFR

6.7 ASDOE Internal Approval Process

To allow for a close management of all CG funds, **ALL** requests for Consolidated Grants goes through a strict step-by-step process to make sure that funds are allowable, allocable, necessary, and reasonable. The following steps is to make sure that there is an internal, correct, check and balance process that all CG requests goes through within the department to make sure that all is okay for approval and process. Step 1: Project Lead; Step 2: FGMO; Step 3: Finance Office; Step 4: Deputy; Step 5: Director (final) before it goes down to Business Office to insert PR before it goes to ASG External. The detailed step of process and procedures is provided in the outlined below:

6.7.1 Step 1: Originators

Any request to use approved funds under Consolidated Grants starts from the **Project Lead** of each project. Each project lead should have in record a copy of the approved current fiscal year project narrative, MOE, and budget narrative. The Project Lead can request approved budget materials in the following process.

1. Submit a FGMO Routing Form request (Form #1)
   a. Submit the correct/updated form
   b. Write the name of the Project approved under CG
   c. Check the correct grant that the request is under *(for example: all CGs should check the box next to CG)*
   d. Sign by Project Lead only, unless PL has assigned an acting in place
2. Request Letter (Form #2)
   a. Request Letter is a letter to the ASDOE Director/or Acting to place a request for the item that is approved under CG funds
   b. The letter needs to be signed by the Project Lead/or acting
   c. The content of the letter should include items requested, funding source, prime number, and total amount.
   d. Items requested should be approved and more importantly allocable, reasonable, and necessary.
3. Copy of approved Project & Budget Narrative highlighting the items requested (Faster Process)
4. Additional Items - Quote (Form #3)

a. Vendors should submit an updated quote. The Vendor should have an address, contact information, and a quote (Vendor ID & License)

b. The amount determines the required amount of quotes-

    i. Less than $10,000.00, only need 1 quote (Based on Office of Procurement SOP)

    ii. More than $10,000.00 needs 3 quotes from different vendors

5. Additional Documentation to provide if

a. SPECS: Any order for technology (computers, laptops, printers, scanner, etc…) request needs SPECS from E-rate. The Project Lead submits a list of items and quantity to the EdTech Division. They provide an updated SPECS to the vendors to provide a quote for the requested items.

b. Amendment: If the amount under each prime is not sufficient to cover the cost of the request, the Project Leads need to submit an amendment request to the FGMO to cover the request. If the request amount exceeds 20%, the amendment request will be forwarded to the USDOE for approval.

c. Sole Source Reference: The Project Lead can use this form to request a specific vendor for service or order

6.7.2 Step 2 : FGMO Review & Approval

Reviews the requisition to ensure that the items/services requested are included in the program and budget narratives. Verification is provided through a signature on the routing form. Each Grant Analyst is given different CG Projects to oversee. Each GA makes sure that the request is approved and completed with all signatures, updated quotes, and necessary additional documents provided. If approved, the GA assigns the Account number and prime number of the CG Project. The routing final review should include the following

- Updated Routing Form signatures
  - ☐ Name of Program/Originator
  - ☐ ASDOE Project Lead/Division Head
  - ☐ ASDOE Federal Grants Office
- Routing Number provided by the GA, used to identify a specific request.
- Routing Form should be stamped to indicate the date & time the GA received the request
- GA goes through a thorough review listed in the following checklist
  - ☐ Make sure all signatures are included
  - ☐ Routing Number is correct and labeled in the form (no repetition)

- ☐ All signatures are in order (PL & GA)
- ☐ Request Letter is assign to the Director of DOE, cc the AD and DD
- ☐ Request Letter should include the following information
    - Date
    - Rationale, Purpose, Account #, Prime
- ☐ Print out and highlight the request item on Budget and Project Narrative (approved write-up)
- ☐ Review materials and see if its allowable, allocable, and necessary
- ☐ Comply with internal and external requirements
    - Technology - SPECS (DOE Ed-Tech)
    - Quote - Update, Not expired, certified vendor, clear, set amount to determine 1 or 3 quotes (Office of Procurement)
    - SSR - OP
    - Amendment - To reallocate no more than 20% of funds in different primes (Only if allowable)
    - Travel - Allowable, 45 day requirement, Itinerary, Travel Forms, Registration, etc.
- ☐ Runs the One-Solution to check the status of funding requests
- ☐ Identify account number and prime for request

- After initial review, each GA make sure to

    - ☐ Record the request in the Requisition Journal (Recordkeeping Spreadsheet - FGMO) - Used for tracking past and current request numbers and description of projects.
    - ☐ Make a copy of the Request and place it in the FGO Requisition Shared Drive
    - ☐ Log the Routing Number and required information in the Outgoing Request Masterlist
    - ☐ Print out the FGMO Outgoing Request Log and take it with the request over to the Finance Office.

When a problem is identified at any step in this process the documentation will be returned to the originator for correction.

6.7.3 Step 3: Finance Office Approval

The Finance Officer staff reviews all requests to ensure account numbers are correct; that procurement policy and procedures are met; and that funds are available.

- The Finance Office should log down the routing form numbers for their record.

- A stamp and signature from the Finance Office will be required for the request to continue its internal approval process.
- The FGMO Outgoing Request Log should be signed and returned to the FGMO with all the Requests.

When a problem is identified at any step in this process the documentation will be returned to the originator for correction.

6.7.4 Step 4: Deputy Director Approval

The Deputy Directors of Instruction and Support Services are tasked with verifying that all proposed purchase requisitions are appropriate and in alignment with the overall mission and goals of the department.

- The second signature is given to the Deputy Directors who oversee specific divisions. They are responsible for signing all requests from their respective divisions. If they have any questions, they can reach out to FGMO or directly to the Project Lead. The Duputies of Instruction and Instruction supports are given this tasks.
- The FGMO Outgoing Request Log must be initial the approval of the internal requests

When a problem is identified at any step in this process the documentation will be returned to the originator for correction.

6.7.5 Step 5: Director of Education Approval

The Director Of Education is the final approver for all contracts and Requisitions. This is the final review and approval of all CG requests. If there is any question, the Director usually sends an inquiry to the FGMO.

6.7.6 Step 6: Business Office - Requisition Office

Once final approval is completed, the final request is routed out to the Business - Purchasing Requisition Office. They will issue the PR number and electronically transmit the request to the Office of Budget and Planning and will follow the ASG workflow process.

When a problem is identified at any step in this process the documentation will be returned to the originator for correction.

Federal Grants Management Office Technical Training 2024
Steps of Routing Process

Step 1: Originators	Step 2: FGMO Review & Approval	Step 3: Finance Approval	Step 4: Deputy Director Approval	Step 5: FINAL: Director's Approval
Any request to use approved funds under Consolidated Grants starts from the **Project Lead** of each project. The Project Lead can request for approved budget materials in the following process.	Reviews the requisition to ensure that the items/services requested are included in the program and budget narratives. Verification is provided through signature on the routing form.	The Finance Office staff reviews all requests to ensure account numbers are correct; that procurement policy and procedures are met; that funds are available; and that requested materials/services are appropriate and allowable.	The Deputy Directors of Instruction and Support Services are tasked with verification that all proposed purchase requisitions are appropriate and in alignment with the overall mission and goals of the department.	The Director Of Education is the final approver for all contracts and Requisitions.

7: ASDOE-FGMO EVALUATION

7.1 ASDOE Monitoring Activities

ASDOE monitoring activities include, but are not limited to, the following:

1. The ASDOE Federal Grant Management Office personnel connect with the project leads through email or by phone to monitor their respective project implementation.
2. The ASDOE Federal Grant Management Office personnel send out a weekly budget status report to various project leads.
3. The ASDOE Federal Grant Management Office personnel and the Private Schools Coordinator follow up with the project leads quarterly and review annual performance reports and their requisitions.
4. The ASDOE Federal Grant Management Office personnel and the Private Schools Coordinator conduct quarterly monitoring visits to the ASDOE divisions and offices and the private schools to assess the project implementation and the status of the procured items and equipment
5. The ASDOE Federal Grant Management Office personnel review the quarterly and annual reports and conduct one-on-one meetings with the project leads to collect and analyze the data and engage in effective planning.
6. The ASDOE Federal Grant Management Office personnel maintain documentation of the monitoring activities in respective Grant Files. This includes

site-visit monitoring reports (signed/dated), email communications, notes from telephone conversations, evaluation reports, and other documentation.

7. Types of Activities Allowable, Deadlines, Updated requirements, additional documentations, and current rates

    a. **Materials & Supplies:** Must adhere to guidelines set for purchases as stated in the American Samoa Department of Education Grant Policy & Procedures Manual (2024):

- Required documentation for all Purchase Requisitions is based on the total cost of the materials/services being requested
- Purchase requisitions for materials/services under $10,000 need only an invoice from a single vendor. Requesters should use a selection of vendors to supply needs and should not rely on a single vendor to meet all needs.
- Purchase requisitions for materials/services equal to $3,500 but less than $10,000 must include quotes from three separate vendors. All quotes must be retained.
- The Office of Procurement must issue a Purchase Order for materials/services greater than or equal to $10,000 for competitive bid, or a sole source request must be submitted to the Chief Procurement Office for approval.
- Sole source approval requests will only be approved if justification is provided that the vendor is the only source for procurement of requested materials/services or the requested services are a continuation of existing services.
- Current quote or invoice should be included in the package.

    b. **Equipment:** Must adhere to guidelines set for purchases as stated in the American Samoa Department of Education Grant Policy & Procedures Manual (2024):

- Required documentation for all Purchase Requisitions is based on the total cost of the materials/services being requested
- Purchase requisitions for materials/services under $10,000 need only an invoice from a single vendor. Requesters should use a selection of vendors to supply needs and should not rely on a single vendor to meet all needs.
- Purchase requisitions for materials/services less or equal to $10,000 need only a single quote but less than $25,000 must include quotes from three separate vendors. All quotes must be retained.
- The Office of Procurement must issue a Purchase Order for materials/services greater than or equal to $25,000 for competitive bid, or a sole source request must be submitted to the Chief Procurement Office for approval.
- Sole source approval requests will only be approved if justification is

provided that the vendor is the only source for procurement of requested materials/services or the requested services are a continuation of existing services.

The following should be included in the requisition package:

1. Inventory of non-consumables (e.g. laptops, desktops, printers, camera, projectors, etc.) purchased under the Consolidated Grant
2. Provide approved survey documents from Ed. Tech/Property Management
3. Current (within 30 days) quote or invoice should be included in the package
4. Specs from Educational Technology (E-Rate) Office

   i. Equiment Maintenance:
      1. The following should be included in the requisition package:
1. Invoice
2. Description of Type of Service Needs
3. Inventory of current equipment

c. Travel

   i. The following should be included in the requisition package:
   ii. Included in CG Project & Budget Narrative foremost.

1. Conference/Training Agenda
2. Conference/Training registration fees
3. Travel Documents
4. Signed note of commitment to conduct PD upon return
5. PD Evaluation from participants

d. Contract

   i. Employment:
- The ASDOE Personnel Office handles the hiring process of personnel that are to be paid under the Consolidated Grant
- Contractual Service(s):

The following should be included in the requisition package:

1. Scope of Service or Scope of Work
2. Floor Plan
3. Invoice
4. Project/Program Evaluation (e.g. survey results from service recipients, completed evaluation form)
5. Project/Program Outcome (e.g. Students' Lexile scores, completion of service)
6. Memorandum of Understanding (MOU) if applicable

e. **Professional Development and After-School & Summer School Programs:** ALL need to provide pre-approval proposal to the Director of the ASDOE. The approval MUST go through the FGMO first for their review before it goes to the Director for approval. After a project is completed, this is what needs to be submitted to the FGMO along with the Request Form and request letter. Failure to provide all necessary documents will result in returning of the whole package requests.

1. Program/Event/Activity Overview
2. Overall Evaluation or Summary of program/activity/event
3. Data (attendance/evaluation data) of the program/activity/event
1) Must be after work hours or on a holiday
2) The following should be included in the requisition package:
   a) Participant Sign in/Sign out sheets and Timesheet
   b) Presenter Sign in/Sign out sheet (clear first name, last name, SS#, time-in and time-out, signature, date)
   c) Presentation, Training, or Meeting Agenda
   d) Presentation evaluation by participants and Project Lead/Facilitator
   e) Summary sheet with amount per hour, SSN, total number of hours with corresponding total amount due, and the sum of requested amounts
   f) Data of the Program/Event/Activity

i. After-schools and summer school

1. Must implement what is written in the CG Project proposals.
2. Timeline of all projects: October 2024- August 2025
3. If the requested item is not included in the narratives, the request will be denied.
4. If the project is not implemented, the project will be suspended, and funds will be returned to SEA.
5. 12 months employees are not eligible for stipends (exempted, timecards) unless as presenters or participant
6. Compensation depends on Project narrative and budget allocation.
7. Timesheet is now in effect
8. Rates:
   ● Teachers: $25/hr
   ● Site Monitor: $25/hr

ii. Stipend Requirements

1. Student roster & attendance
2. Teacher Evaluations
3. Lessons taught
4. Teacher-prepared assessments
5. Pre and post assessments results
6. Timecards
7. Summary sheet with: Amount per hour; SSN; total number of

hours with correspondence total amount due, and sum of requested amounts.

For Program Facilitator(s), Project Leads, Program Supervisors. Must have the following:
1. Program/Event/Activity Overview
2. Overall Evaluation or Summary of program/activity/event
3. Data of the Program/Event/Activity

7.2 ASDOE - External

7.2.1 Budget Office: Budget analyst reviews for compliance with funding on requests from ASDOE. If its noncompliance, the request is returned to the department. The Budget office then encumber the amount in the One-Solution Accounting system. Any BUD202 is review and forwarded to the Treasury to upload on the IFAS system. Department then pick up and route to treasury or procurement office.

7.2.2 Treasury Office: The grant analyst from Treasury review the PR. After, it is routed out to different divisions within Treasury for further actions. All DPV are routed to Accounts Payable, Disbursements are responsible for payment and TA are issue Routing number and encumber in the system.

Final process goes to back to Treasury for drawdown, to Accounts Payable and Dispursemnet for vendor checks.

7.2.3 Office of Procurement: Procurement issue PO and sign receiving report. After system approval, the request is routed back to Treasury for further processing.

Further explanation is shown in the Flow Chart below.

A.S.G. STANDARD OFFICE PROCEDURES (S.O.P) FLOW CHART

Provided by: Office of Program, Planning and Budget

- PAPERLESS PR (Initiate by Dept.)
- TA Forms

If there are problems forward back to Agency

TREASURY
☐ GRANT ANALYST (review PR)
☐ ACCOUNTS PAYABLE (process DPV)
☐ DISBURSEMENT(issue payment)
☐ TA issue R# & encumber

HUMAN RESOURCES

DIRECT PAYMENT VOUCHER (D.P.V)
- Route to Budget (review & encumber)
- Dept. route to Accounts Payable
- A/P forward to Grant Analyst - final review before payment is processed

- FORM 35
- FORM 48
- PERSONNEL CONTRACTS
- CONTRACT EXTENSIONS

BUDGET OFFICE
BUDGET ANALYST REVIEW FOR COMPLIANCE & FUNDING ALL FORMS
(Return to Dept. for non-compliance &/or Budget Block)
ENCUMBER IN IFAS (DPV, Contracts, Leases, Change Notices)
BUD 202 (Review and forward to Treasury to upload in IFAS)
DEPT. PICK UP & ROUTE TO TREASURY / PROCUREMENT

PROCUREMENT
✓ Issue PO
✓ Sign Recieving Report
✓ Dept. route to

TREASURY
Grants for Draw down
Accounts Payable
Disbursement (Vendor Checks)

➢ BUD 202 - Grant Awards
➢ BUD 14 - Local Funds Transfer
➢ SOLE SOURCE
➢ PROCUREMENT CONSTRUCTION REQ. (For Bid)
➢ STUB REQUISITION

❖ INDEPENDENT SERVICE CONTRACTS
❖ LEASES
❖ CHANGE NOTICES

ATTORNEY GENERAL

Legal review

ASG DEPARTMENT FORMS

7.3 Monitoring and Corrective Actions

ASDOE conducts federal fiscal grant subrecipient monitoring and compliance reviews and implements related corrective actions, in accordance with established policies and procedures. Annual monitoring schedules and findings are required to be maintained in ASDOE Grant Files.

7.3.1 Noncompliance and Corrective Actions

Corrective actions can be imposed by the Administrator Of Grants Management, Oversight, and Accountability when organizations fail to comply with the terms and conditions of federal grant programs. The purpose of the corrective action is to ensure that the organization corrects the noncompliant activity.

ASDOE may identify a sub-recipient as non-compliant because of findings in a single audit, a federal monitoring review, or because of concerns identified through other means. Once identified, the project lead will receive a letter notifying her/him that the division/school/office is complying or required to complete corrective action. The letter describes the areas of noncompliance; the required corrective action, including any enforcement actions; and the required completion date.

7.3.2 Types of Noncompliance

Types of noncompliance may include, but are not limited to, the following:

- Expenditure of funds or conducting activities that are not in accordance with the grant's authorizing statute, regulations, guidelines, or approved application.
- Failure to account for funds in accordance with financial management standards or with the Financial Accountability Resource (FAR).
- Findings in a single audit conducted by an independent auditor
- Failure to comply with federal maintenance of effort requirements under the Individuals with Disabilities Education Act (IDEA)
- Failure to comply with:
  - One or more of the provisions and assurances in the grant application
  - Programmatic or fiscal reporting and document retention requirements
  - Previous required corrective actions, refund requests, or special conditions

7.3.3 Enforcement

ASDOE may impose an enforcement action as part of corrective action for noncompliance with a previous corrective action. Title 2 of the Code of Federal Regulations (CFR), Part 200.338, authorizes ASDOE to impose enforcement actions. Enforcement actions may include the following:

- Temporarily withhold payments pending correction of the deficiency or more severe enforcement action.
- Disallow all or part of the cost of the activity or action not in compliance.
- Wholly or partly suspend or terminate the federal award.
- Withhold further federal awards for the grant.
- Take other remedies that may be legally available.

NonCompliance & Corrective Actions

E. Enforcement

ASDOE may impose an enforcement action as part of a corrective action for noncompliance with a previous corrective action.

D. The letter describes the areas of noncompliance; the required corrective action, including any enforcement actions; and the required completion date.

Corrective actions Steps
The purpose of the corrective action is to ensure that the ASDOE corrects the noncompliant activity.

A. Corrective actions can be imposed by the FGMO when projects fail to comply with the terms and conditions of federal grant programs.

B. ASDOE may identify a sub-recipient as noncompliant because of findings in a federal monitoring review, or because of concerns identified through other means.

C. Once identified, the project lead will receive a letter notifying her/him that the division/school/office is complying or required to complete a corrective action.

7.3.4 Amendments

The following points broadly outline the criteria for reallocations and rebudgeting under EDGAR:

1. Amendment effective date must be included.
2. Amendment requests cannot exceed 25% of the total budgeted amount.
3. Amendment requests cannot be made for a spending category in which $0 has previously been budgeted. However, a spending category that was previously not budgeted may be added in the amendment request.
4. Amendment requests are not required to increase or decrease funds that have been budgeted for a line item on any supporting budget schedule except payroll costs. Note that in such a request, the description of the line item cannot change.
5. Amendment requests are not required for increases in salary amounts of 10% or less for budgeted positions (e.g. project director, teacher).
6. Amendment requests are required for salary increases of more than 10% for discretionary competitive grants. Formula-funded grantees are not required to submit a reallocation request. However, States should remember that total reallocations cannot exceed 25% of the total budgeted amount.
7. Amendment requests are required to increase or decrease the number of approved positions by more than 20%.

8. Grantees receiving discretionary funds are required to submit a formal amendment request to increase or decrease the number of approved positions by 20% or less. Formula-funded grants do not require the approval, however.
9. Amendment requests must be submitted for any position not initially approved in the grant application.
10. Amendment requests must be submitted to add a new item or increase the number of previously approved capital outlay items.
11. Amendment requests must be submitted to reduce funds previously allotted for training costs, when those training costs are direct payments or reimbursements to trainees (i.e. travel and lodging, working or conference registration fees, tuition, books, and related fees). This requirement is waived for programs covered under Ed-Flex.
12. Amendment requests are required for any additional funding applicable to the grant.
13. Amendment Requests are required to revise the scope or objectives of the grant, regardless of whether the proposed program changes result in changes to the budget.
14. Amendment requests do not need to be submitted when budgeting for indirect costs. This is because indirect costs are not required in the initial grant application budget.
15. Supplies and materials do not require specific approval under EDGAR.

7.3.5 Training

Training activities may include off-island venues, such as conferences or seminars held in mainland USA, or local (in-house) training provided by a consultant or contractor. After a training, the Project Lead is expected to submit a request form with the following below for compensation. Supporting documentation for grant-funded training activities includes the following:

1. Approval to participate, signed by supervisor, approved by Grant Coordinator
2. Agenda;
3. Invitation letter from grantor (if applicable);
4. Registration with course description;
5. Paid invoices,
6. Sign-in Sheets (in-house training),
7. Agendas,
8. Copies of Certificates of Completion,
9. Consultant training agreement or contract (in-house training),

10. Paid invoices for training consultants or contractors.

7.3.6 Inventory of Property

All grant funding recipients must ensure that a complete physical inventory of all property is taken at least once each fiscal year. *(See Asset Management SOP)*

8: GRANTS MANAGEMENT, OVERSIGHT, AND ACCOUNTABILITY

The American Samoa Department of Education's (ASDOE) Federal Grant Management Office (FGMO), monitors compliance with requirements applicable to a grant program, and the related use of funds. The office operates directly under the leadership of the ASDOE Director. Monitoring is conducted to ensure compliance with local and federal laws, regulations, and financial accountability, including compliance with grant requirements.

8.1 Monitoring Requirements for ASDOE

ASDOE must monitor the activities of federal grant sub-recipients to ensure that federal grant awards are used for authorized purposes in compliance with federal statutes, regulations, and the terms and conditions of federal awards. The FGMO Manager with the assistance of the office make sure that all requirements for CG is followed and addressed   This requirement is given in Title 2 of the Code of Federal Regulations (CFR), 200.331d) and 34 CFR 76.770.

8.2 Requirements for Federal Grant Subrecipients

Federal grant subrecipients must comply with the following requirements:

- Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (https://www2.ed.gov/policy/fund/guid/uniform-guidance/index.html)
- Consolidated Grant Application (https://oese.ed.gov/files/2022/12/FY-2023-2025-CG-Application-Package_Final.pdf)

8.3 Compliance with Federal Financial Management Standards

All subrecipients of federal grants must have a financial management system that meets certain federal financial management standards. This requirement is specified in the

general and fiscal guidelines and general provisions and assurances published and adhered to by ASG. All grant applicants agree to this requirement when they certify and submit the grant application. The requirement is given in 2 CFR 200.302.

- One-Solution Accounting System (See 6.5.1)

8.4 Compliance with Financial Accounting and Reporting

ASDOE must maintain records in accordance with the accounting and reporting provisions or the Federal Acquisition Regulation (FAR)and comply with federal financial management standards requiring that grant funds be accounted for according to a fund-code structure. The ASG accounting system must allow ASDOE to report budgets, encumbrances, and expenditures in its general ledger in accordance with FAR.

- See ASDOE Finance Office SOP 2024

8.5 Compliance With Generally Accepted Accounting Principles:

All subrecipients of federal grants must account for expenditures in accordance with generally accepted accounting principles (GAAP). GAAP addresses issues that help subrecipients account for their expenditures consistently and maintain financial statements that are reliable and verifiable by an independent party. FAR code structures are established to accommodate compliance with GAAP, which reflects federal financial accounting standards.

- See AS-Treasury SOP
- See ASDOE Finance Office SOP 2024

9: NON-PUBLIC SCHOOLS EQUITABLE SERVICES

This section describes ASDOE plans for compliance with equitable private nonprofit school (PNP) services requirements under the Every Student Succeeds Act (ESSA).

9.1. Q & A

1. What constitutes private non-profit status?
    a. Under 34 CFR 77.1, the term "nonprofit" as applied to an agency, organization, or institution means that it is owned and operated by one or more corporations or associations whose net earnings do not benefit, cannot lawfully benefit, any private shareholder or entity. Per the USDE Office of General Council, if a church that operates a school meets the definition of a nonprofit, the school does not need separate nonprofit status.

2. What are private school equitable services?
   a. The term "private school equitable service" refers to the process of providing students, teachers, staff, and families at eligible PNPs with fair access to federally funded education programs and services, as appropriate. The process depends on a "timely and meaningful consultation" between ASDOE officials and those of eligible PNPs. However, federal funds may not be awarded or paid to the PNP.

3. What types of services can be provided to PNP's ?
   a. The ASDOE and PNP collaborate via meaningful consultation to determine what education services will be provided and how. Services may include but are not limited to, professional development for teachers, summer school programs, and provision of supplemental instructional materials and supplies

4. Who is required to provide PNPs with equitable services?
   a. ASDOE. The point of contact is the ASDOE's Ombudsman. The point of contact for PNPs is the Private School Coordinator.

5. What is "meaningful consultation"?
   a. Meaningful consultation provides sufficient information, time, and a genuine opportunity for all parties to express their views, to have their views seriously considered, and to discuss viable options for ensuring equitable participation of eligible PNP students, teachers, other education personnel, and families. This requires that the ASDOE has not made any decisions that will impact the participation of PNPs prior to consultation or established a blanket rule that precludes PNP students, teachers, and others from receiving certain services authorized under applicable federally-funded programs. ASDOE should consult with PNP officials about a timeline for consultation and provide adequate notice of such consultation to ensure the consultation is meaningful and the likelihood that those involved will be well prepared with the necessary information and data for decision-making.

6. How do PNPs confirm that meaningful and timely consultation has occurred and if the program design is equitable for eligible PNP students?
   a. In the Affirmation of Consultation with PNP School Officials, the PNP either agrees or disagrees that meaningful and timely consultation has occurred and that the program design is equitable for each applicable program (ESSA, Sec. 1117(b)

7. How does ASDOE calculate how much to set aside for equitable services in eligible PNPs?

    a. ASDOE utilizes a per pupil cost of Total Grant Award minus five percent for the SEA. The difference is divided by the enrollment of the previous school year.

8. Who is responsible for ensuring that PNPs receive access to equitable services?

    a. The responsibility belongs to the ASDOE Ombudsman

9. What records on consultation must ASDOE maintain?

    a. ASDOE must maintain and make available a written affirmation, signed and dated by officials of each PNP, that the required consultation has occurred.

10. Can ASDOE reimburse PNPs for providing services or materials?

    a. No. The ASDOE may not reimburse a PNP for services or materials purchased by the private school. However, ASDOE may reimburse PNP teachers or other educational personnel for PRE-APPROVED professional development that is otherwise an allowable use of Federal funds.

11. Are registration and travel costs for participating PNPs allowable?

    a. Yes. Equitable services to PNP schools are required and therefore allowable. Under federal program statute, this may include registration and travel costs for participation in allowable professional development activities. See ASDOE Participant Support Costs and Travel Form (See Appendix A) for use in requesting pre-approval.

12. Does ASDOE need to maintain internal controls when providing equitable services, materials, and equipment to eligible PNPs?

    a. 2 CFR 200.303 requires grantees to implement internal controls for the administration of federal grants. Grantees must establish and maintain effective internal control over federal grants and provide reasonable assurance that they comply with all laws, regulations, and requirements related to the grants they receive. ASDOE as a grantee, must evaluate and monitor compliance with grant requirements and address any noncompliance identified, including any found in audit or monitoring findings.

13. Who reviews and monitors to see if ASDOE is maintaining internal controls when providing equitable PNP services?

    a. Federal Grant Management Office monitors the expenditures of federal grant recipients for compliance with various fiscal requirements and ensures that federal awards are used for authorized purposes in compliance with laws, regulations, and the provisions of contracts or grant agreements.

14. Can ASDOE carry over unobligated funds despite the ESSA requirement to spend funds for PNP equitable services in the current school year?

a. There may be extenuating circumstances when An LEA is unable to obligate all funds within the current school year. Under these circumstances, the funds may remain available for the provision of equitable services under the respective program during the subsequent school year if approved by the ASDOE. In determining how carryover funds will be used, the LEA must consult with appropriate private school officials (e.g. Private Schools Coordinator).[ESSA sections 1117(b) and 8501(c)].

15. What is the role of the ASDOE designated ombudsman?

a. The ombudsman serves as ASDOEs' primary point of contact for addressing questions and concerns from PNPs regarding the provision of equitable services. In addition, the ombudsman is required to monitor and enforce equitable service requirements and participate in ASDOEs' monitoring processes.

16. What are the procedures for filing a complaint against ASDOE for not providing equitable services?

a. An individual or organization may submit a complaint to ASDOE and expect a written response within 45 days. (ESSA Sections 1117(b)(6), 1117((c)(2), and 8503(a)(b)). The complaint must provide specific details, such as the dates of meetings or correspondence with the PNP or ASDOE, facts that support the claim that equitable services were not provided, and the complainant's efforts to resolve claims (Complaint Form and Procedures below).

9.2 Monitoring

Through monitoring activities, the Ombudsman, the Private Schools Coordinator, and the Federal Grant Management Office will ensure that ASDOE maintains compliance with applicable fiscal requirements of federal grants to meet project goals.

9.2.1 PNP Ombudsman

ASDOE has identified an ombudsman requirement under Title I, Part A, and Title VII of ESSA. The ombudsman serves as ASDOE's primary point of contact for addressing questions and concerns from private school officials. Other ombudsman duties include the following:

- Providing technical expertise in interpreting, understanding, and implementing accountability requirements for equitable services

- Providing guidance to private schools, as needed
- Addressing complaints regarding consultation and/or equitable services provisions: Refer to the PNP Complaint Forms section above for links to the complaint procedures and forms.
- Ensuring all equitable services reporting requirements are met Overseeing the ASDOE Private School Equitable Services Workgroup

Federal Grants Management Office

American Samoa Department of Education

_____

_____

9.2.2 Non-Public Schools (NPS) - Equity Services

General Information: After the United States Department of Education "Monitoring Visit" in September 2023, the American Samoa Department of Education (ASDOE) looked into an internal review of the role of the ASDOE and Non-Public Schools (aka Private Schools). Further recommendations from the grantors have led to the review of some of the services that will be provided for the Non-Public Schools in the coming months. This form will illustrate the required services that will be provided for all NPS that receive services under ASDOE.

1. **Consultation:** An LEA must consult with appropriate private school officials regarding equitable services under covered ESEA programs. The goal of the consultation is reaching an agreement between the LEA and appropriate private school officials on how to provide equitable and effective programs for eligible private school children and educators. (ESEA section 8501(c)(1)). After timely and meaningful consultation, an LEA makes the final decisions with respect to the services to be provided to eligible private school children and educators. (34 C.F.R. § 299.7(b)(3)).

2. **Intent to Participate**: This is a document that some LEAs may choose to send annually to private school officials to determine their interest in receiving equitable services for eligible private school children and educators under one or more covered ESEA programs. The form might include a brief description of the programs for which equitable services are available as well as a list of allowable activities, services, and benefits. Some LEAs send this form by registered mail in order to document receipt of the form by private school officials. An LEA might also send such a form by email with a read receipt.

3. **Delivery of Equitable Services**: An LEA must provide equitable services under a covered ESEA program to the extent consistent with the number of eligible children in areas served by the LEA who are enrolled in private elementary and secondary schools. (ESEA section 8501(a)(1)).

   a. *Private school officials have no authority to obligate or receive Title I funds. The ESEA requires an LEA to maintain control of Title I funds, materials, equipment, and property. (ESEA section 1117(d)(1)). Thus, no Title I funds may be paid to a private school, even as reimbursement.*

   9.2.3. ESEA Equitable Services: Six Key Points

1. The law provides for equitable participation of private school students, teachers, and other educational personnel, and, in some cases, families.
2. Consultation must be timely and meaningful.
3. Funds generated for equitable services must be equal on a per-pupil basis.
4. ASDOE control funds, Private schools do not receive funds.
5. Services must be secular, neutral, and non-ideological; supplemental; and cost must be allowable, necessary, and reasonable.
6. Private school officials have the right to file a formal complaint.

Services to improve the academic achievement of participating private school children may include, but are not limited to, the following:

☐ Instruction outside of the regular classroom
☐ Expanded learning time, including before- and after-school programs
☐ One-on-one tutoring
☐ Summer school programs
☐ Family literacy programs
☐ Counseling programs
☐ Mentoring programs
☐ Computer-assisted instruction
☐ Instruction using take-home computers
☐ Any combination of the above.

Title I funds may be used to pay for stipends for private school instructional staff, if reasonable and necessary (e.g., time outside regular employment hours). An LEA must pay such stipends directly to the private school instructional staff and not to the private school.

Funds for repairs, minor remodeling, or construction at a private school: No. 34 C.F.R. § 299.9(e) provides that "[n]o funds may be used for repairs, minor remodeling, or construction of private school facilities." Equipment and supplies may be placed in a private school provided that these supplies are used only for allowable purposes of the program to which they are charged and can be removed from the private school without remodeling the private school facility. (34 C.F.R. § 299.9(c)).

State Ombudsman

To help ensure equitable services and other benefits for eligible private school children and educators, an SEA must designate an ombudsman to monitor and enforce ESEA equitable services requirements under Title VIII. (ESEA section 8501(a)(3)(B)). The ombudsman must also monitor and enforce the equitable services requirements under Title I, Part A (ESEA section 1117(a)(3)(B)).

An ombudsman serves as a SEA's primary point of contact for addressing questions and concerns from private school officials and LEAs regarding the provision of ESEA equitable services. In addition, ESEA section 8501(a)(3)(B) requires the ombudsman to monitor and enforce the equitable services requirements under Title VIII, and, thus, the ombudsman should have a significant role in the State's monitoring process. Furthermore, it is important that the ombudsman become familiar with the information that the Department provides concerning equitable services. The following are examples of activities the ombudsman could undertake in fulfilling the roles and responsibilities of the position:

- ❖ Serve as a general resource regarding equitable services requirements for both LEAs and private school officials, which may include conducting initial outreach to define the contours of the ombudsman's responsibilities.
- ❖ Develop, in partnership with other relevant SEA staff, monitoring protocols applicable to the provision of equitable services and participate in a sample of any monitoring activity.
- ❖ Provide technical assistance regarding equitable services requirements for SEA staff administering a covered ESEA program, LEA staff, and private school officials.
- ❖ Establish a process for receiving documentation of affirmation of consultation consistent with the consultation requirement that such documentation be transmitted to the SEA. (ESEA section 8501(c)(5)).

❖ Participate in the State's nonpublic schools working group as applicable. (See A-21).

In moving forward, all NPS Project Leads will report directly to the Private School Office (PSO) for any requests, inquiries, or projects. The Private School Office will ONLY be your Point of Contact (POC) within ASDOE. Please see the checklist below for further information in moving forward.

☐ Project Leads submit requests for initial review with PSO
☐ PSO after review and approval will submit to FGO for internal review and approval
☐ Inquiries of any requests will go through the PSO
☐ Starting within the new FY, only PSO will view your Budget Position Report and provide a current report.
☐ Amendments Request will be completed by PSO
☐ Meetings will be called by PSO to submit quarterly reports and scheduled site visits
☐ Inventories of all materials and supplies are mandatory to be submitted within an allotted timeframe by the PS

10: Conclusion

FY 2023 updates on the current projects under Consolidated Grant. Below is a list of approved projects that are currently overseen by ASDOE.

10.1 FY 2023 CG Project Summaries

ESEA Title I, Part B – State Assessment Grants

• Student Assessment – This project supports A.S.D.O.E's Office of Testing, Evaluation, and Accountability in aligning the Standards-Based Assessment to the 2011 ASDOE College Career Ready Standards.

ESEA Title V, Part B, Subpart 2 – RLIS

● SEA Administration – This project covers various services and activities related to the oversight and monitoring of CG implementation of activities authorized

under RLIS as well as technical assistance for project leads.

- Integrated Data Services – This project provides support for an integrated data system that links individual-level data from multiple sources into one unified system, as well as related professional development opportunities.

- Technology Integration – This project provides technology integration and training to improve student learning, prepare students for a technology-driven world, and improve the quality of teaching and administration by integrating technology into the curriculum and classroom.
- Student Services – This project provides support and services to reduce the dropout rate, increase the amount of high school students who graduate on time, and prepare students for career and life.
- Promoting Proficiency in Literacy and Numeracy – This project aims to improve math and reading literacy through improving integrated geometry-reading skills for 4th through 6th grades, accelerated pre-algebra and advanced reading skills for 7th grade, educator training, and after-school and summer school tutoring.

- Teacher Quality – This project aims to improve teacher quality by implementing a support system to retain effective teachers, invest in teacher training, and support pathways to teacher certification.
- Class Size Reduction – This project aims to reduce the teacher-student ratio in ASDOE classrooms from a teacher-student ratio of 1 to 30 to a teacher-student ratio of 1 to 25 by recruiting, hiring, and retaining highly effective teachers.

- Keeping Effective Educators Enriched Program – This project supports principals and potential school leaders in becoming effective instructional leaders for student academic success through the implementation of the KEEEP Professional Development and Incentive Plan
- Supporting College and Career Readiness – This project provides resources, interventions, professional development, and training to improve student academic growth and outcomes as well as to implement the College and Career Readiness Standards as part of a well-rounded education program so students are college and career ready.
- ASDOE Student Success and Safety Program – This project supports student success and safety through the implementation of a behavior intervention project, a Response to Intervention program, a positive behavior intervention and supports (PBIS) program, and a high school guidance transition program.

- American Samoa Private Schools' Innovative Approaches to Enhancing Student Learning and Achievement – This project supports the following projects that will be implemented in non-public schools in American Samoa: Supporting Effective Instruction, Improving Academic Achievement in Literacy, Student Support and Academic Enrichment, and afterschool and summer school services.
- Library Services – This project supports student learning by providing supplemental materials and services through ASDOE's Library Division as well as providing teachers and students with media resources for instruction and learning.
- Parents and Community – Providing Positive Engagement of Parents and Community in ASDOE Schools – This project will support meaningful and effective parent involvement in the education of their children. The project will implement a Parent Learning Center, community afterschool enrichment and tutoring, and community summer school, and engage the community in safe and secure schools.
- Athletics – Health and Fitness for All – This project will provide the necessary support to assist the ASDOE physical education program to extend more time and more activities for students to stay healthy and physically active.
- ASDOE College Acceleration Program – This project prepares students for college, career, and life through Advanced Placement courses, dual enrollment, and computer science courses.
- Wireless Project – The project will fill in the internet gap that is needed to enhance teaching and learning by expanding broadband access, training staff on new technology, and installing wireless access points.
- Career and Technical Education Improvement Project – This project supports the implementation of a Comprehensive CTE Improvement Plan that focuses on career readiness and career pathways for high school students, career awareness and exploration in middle school, and CTE professional development.

11: APPENDICES

Appendix 11.1 ASDOE Routing Form

☐ Consolidated Grant

☐ ESF I

☐ ESF II

☐ ARP

☐ ECE Grant

☐ School Lunch Program

☐ Maintenance

☐ Other Grants

DEPARTMENT OF EDUCATION
Pago Pago, American Samoa
Tel: (684) 633-5237/633-1026 Fax: (684) 633-4240

Routing Form

Federal Grants Office

Requisition #: _____

1. _____
   Name of Program/Originator
   _____ Date

2. _____
   ASDOE Project Lead/Division Head
   _____ Date

3. _____
   ASDOE Federal Grants Office
   _____ Date

4. _____
   ASDOE Deputy Director
   _____ Date

5. _____
   ASDOE Chief Financial Officer
   _____ Date

6. _____
   ASDOE Director's Review/Approval
   _____ Date

Please, do not write below this line.

For DOE Internal Offices Only

ASDOE Routing Form
Revised MAR2024

Appendix 11.2. Amendment Form

American Samoa Department of Education
Grant Amendment Form
SY: 2024-2025

Amendment Requisition Number: _____

Please check the appropriate box

Type of Grant	☐ Consolidated Grant	☐ ESF I	☐ ESF II	☐ ARP

Date of Request:	Please specify ☐ Activity Amendment Only ☐ Budget Amendment Only ☐ Project & Budget Amendment

Project Number:	Project Title:

Contact Person:	email:	Ph. Number:

Please state all necessary information. Attach copies of all revised materials that are included in this program amendment request. Indicate which pages have been revised in the box below:

2

Please provide <u>justification</u> for the requested program amendments below (note: any budget amendments must comply with the GAN, ASDOE policy and procedures, and applicable Federal laws, regulations, and guidance):

	Printed Name	Signature	Date
Program Lead			

***** ***** ***** ***** ***** ***** ***** ***** ***** ***** ***** ***** ***** ***** *****

Return for revision(s): ☐   **Denied:** ☐   **Approved:** ☐

Required Signatures:

	Printed Name	Signature	Date
Grants Office			
Chief Financial Officer			
Director of Education			
Note: Routing to funding agencies is required for certain programs or budget amendment requests. See: GAN and ASDOE Policy and Procedures Manual			

American Samoa Department of Education
Federal Grants Office
Ph: 633-1026/633-1027
Email: asdoefederalgrantsoffice@doe.as

UpdatedAug2024

Appendix 11.3. FGMO Teachnical Assistance Evaluation Form

CONSOLIDATED GRANT TECHNICAL ASSISTANCE TRAINING 2024 EVALUATION FORM

Talofa Project Leads and Assistants!

The Federal Grants Management Office (FGMO), the Finance Office, and the Business Office hosted a technical assistance training to sub-grantees on policies, protocols, processes, and procedures on expending grant funds. The Team also provided assistance in understanding the management and implementation of projects under Consolidated Grant in addition to identifying best practices to enhance academic needs of all students and how to evaluate project outcomes.

Please complete the evaluation form. Choose all that applies and provide comments and feedback for improvement.

* Indicates required question

1. Email *

_____

2. MAIN PRESENTER(S) *

Check all that apply.

☐ Federal Grants Management Office
☐ Finance Office
☐ Business Office
☐ Private School Office
☐ Personnel
☐ Other: _____

3. DATE *

_____

Example: January 7, 2019

4. LOCATION *

Mark only one oval.

○ DOE Main Office Conference Room

○ SPED Conference Room

○ ECE Conference Room

○ Multipurpose Conference Room

5. PROFESSIONAL ROLE *

Mark only one oval.

○ Teacher (Elementary)

○ Teacher (Secondary)

○ Principal/Assistant Principal

○ Curriculum Specialist

○ Central Administrator

○ Resource Teacher

○ Finance/Budget Specialist

○ Consolidated Grant Project Lead

○ Consolidated Grant Project Assistant

○ Other: _____

6. Based on your experience, how would you rate this session (e.g. workshop, meeting, webinar) in each of the following respects? Please check the number that applies ✱

Mark only one oval per row.

	Strongly Agree 5	Agree 4	Neither agree or disagree 3	Disagree 2	Strongly Disagree 1
Objectives for the session were stated clearly and met.	◯	◯	◯	◯	◯
The presenter was knowledgeable about the subject.	◯	◯	◯	◯	◯
The information and resources presented were of high quality.	◯	◯	◯	◯	◯
The information and resurces presented were easy to understand and use.	◯	◯	◯	◯	◯
Ideas, information and materials shared are directly useful to my work.	◯	◯	◯	◯	◯
I can apply or use information from this session to lead or support	◯	◯	◯	◯	◯

7. What did you find most useful about this training? *

_____

_____

_____

_____

_____

8. What recommendations do you have for improving the content, format and/or style of   *
   these training?

_____

_____

_____

_____

_____

9. How do you plan to use the information shared in today's workshop to enhance your   *
   professional duties?

_____

_____

_____

_____

_____

10. Area/topics about which you would like to receive further information or assistance. *

_____

_____

_____

_____

_____

Appendix 11.4. FGMO Monitoring Form

AMERICAN SAMOA DEPARTMENT OF EDUCATION
Federal Grants Management Office
Monitoring Template

Grant Type:

☐ CG
☐ ESF I
☐ ESF II
☐ ARP

Date	
Project Name	
Project Lead	

Performance Goal Review

Performance Goals	Achieved Comments
	Yes No
	Yes No
	Yes No
	Yes No

Performance Measures Met

Performance Measures	Achieved Comments
	Yes No

	Yes No
	Yes No

Preliminary Evidence/Results of Progress

Unexpected Challenges or Delays

Fiscal Review

Item	Current Data Comments
Project Budget	
Total Expended to Date	
Available Funds	
Allowable Use of Funds	
Document Retention	
Inventory Tracking	

Compliance Review

Activities Compliant Comments

	Yes

	No
	Yes No
	Yes No
	Yes No

Summary of Recommendations and Further Action(s) Required

Signatures

Project Lead	Date
ASDOE Grants Analyst	Date
ASDOE Grants Manager	Date

Appendix 11.5. Quarterly Report Form

Quarterly Performance Report
FY _____ Consolidated Grant
American Samoa Department of Education

Project Title:_____

Population Served		
Students	Teachers	Administrators

Project Objectives (should be the same as the MOE)	Performance Activity	Data Source	Measurement	Baseline Data	Quarter 1	Quarter 2	Quarter 3	Quarter 4

Evidence of Success/Progress
First Quarter
Second Quarter
Third Quarter
Fourth Quarter

Observations and Challenges
First Quarter
Second Quarter
Third Quarter
Fourth Quarter

Project Budget	
Allocated	Expended

Appendix 11.6. Annual Accomplishment Report

ANNUAL ACCOMPLISHMENT REPORT

AMERICAN SAMOA DEPARTMENT OF EDUCATION - YEAR 2024

Introduction:

Accomplishments: Details profiling what your Division has accomplished in the first year of administration (Year 2021)	Challenges: What challenges lie ahead and how can they be overcome?	Opportunities: Where do the greatest opportunities lie and how can they be realized?	Goals: Identify your Division goals.	Conclusion:

Appendix 11.7. Pre-Approved Proposal

Program/Event/Activity	Description of Program
Name	*(Insert the name of the program)*
Objective(s)	*(Write out 3 objectives of the program)*
Outcome(s)	*(Include all perceived/projected outcomes as a direct result of the program)*
Target Audience	*(List all of the "audience" members of the program- who will be involved? Who is this program directed towards?)*
Implementation Period	*(Specifically list out the Implementation timeline of the program)*
Means of Evaluating Program Outcome(s)	*(How will you, as a division, evaluate this program?)*
Data Source & analysis	*(What data will be collected? How will it be collected? How will data be analyzed?)*
External Agencies	*(List out any external agencies involved in this program, including any from either the government or private sector)*
Implementation Team	*(Who will be implementing this program?)*
Materials/Supplies	*(List all of the materials/supplies used in this program)*
Funding	*(Detailed account of funding dissemination)*
Monitoring Team	*(Who will be monitoring this program?)*

Appendix 11.8.1. Non-Public School Equitable Services Forms **-** LETTER OF INTENT

AMERICAN SAMOA DEPARTMENT OF EDUCATION

Non-Public School Intent to Participate - 2023-2024 school year
(to be completed by Non-Public School and returned to ASDOE within 30 days of post-mark)

Name of Non-Public School:

The school's business model is:
☐ Non-profit   ☐ For-profit *(not eligible for equitable services)*

Private School Address:

Non-Public School Representative

Name:	Title:	
Phone:	Email:	
Signature:		Date:

☐   We <u>do not</u> intend to participate in any equitable services programs for school year 2023-2024.
(If choosing not to participate, stop here, and return this form to the school district.)

☐   Assuming we are determined during consultation to be eligible to participate, we intend to participate in the following 2023-2024 equitable services programs identified in the contact letter as being offered by the school district:

☐ Title I-A   ☐ Title I-C   ☐ Title II-A   ☐ Title III-A
☐ Title IV-A   ☐ Title V-Part B, Subpart 2

Grades/Enrollment (current) at Non-Public School:

K			7	

1		8	
2		9	
3		10	
4		11	
5		12	
6		Total	

☐ The private school received equitable services during the preceding school year, or

☐ The private school is seeking to receive equitable services for the first time.

If participating, the Non-Public School will be contacted when this form is returned to ASDOE

Upload the returned form to ASDOE by March 6, 2024

Appendix 11.8.2. PRIVATE SCHOOL Participant Support Costs

AMERICAN SAMOA DEPARTMENT OF EDUCATION

Request for Approval of Participant Support Costs
Private School Equitable Services Form
School Year 2024-2025

The Purpose of this form is to provide required approval to all grantees that expend any federal grant funds on the provision of equitable services to nonprofit schools (NPS), by the requirements of the Every Student Succeeds Act (ESSA). Equitable services to NPS that are required, and therefore allowable, under federal program statute, include registration and travel costs for NPS staff participating in allowable professional development activities. Title 2 of the Code of Federal Regulations (2 CFR) 200.456 makes allowable the expenditure of federal grant funds on participant support costs. According to the definition provided in 2 CFR 200.75, "participant support costs" means the direct cost of providing training, including attendance of professional conferences, to grant program participants. Direct costs may include the cost of travel to the training and any registration fees.

A nonpublic staff member who travels for an approved professional development opportunity, may be reimbursed for the actual cost of lodging and meals. However, the reimbursements out of grant funds may not exceed the maximum meals and lodging rates based on federal travel regulations.

This form applies to all ASDOE subrecipients and to any federal grant administered by ASDOE in which equitable services to NPS are required and therefore allowable.

Name of ASDOE Project (s)	
Name of NPS	

Description of Costs Planned for Provision of Equitable Services
To provide equitable services to NPS, the grantee must expend federal grant funds on the following participant support costs, which are required and therefore allowable under the grant. The Required/allowable participant support costs are registration, travel and

transportation, lodging, and meal costs for NPS staff participating in allowable professional development activities.

How Costs are Reasonable and Necessary, Allocable, and Properly Documented
These activities are required, and therefore allowable, under specific program statute. Failure to provide these activities may be considered noncompliance with federal statute.

FOR ASDOE USE
ONLY_____

☐ Participant support costs are related to providing equitable services to eligible private nonprofit schools
☐ Request for prior written approval is granted

Required Signatures:

LEA Project Lead		Date:
ASDOE Private School Coordinator		Date:
ASDOE Project Manager		Date:
ASDOE Business Office		Date:

Appendix 11.8.3. NON-PUBLIC SCHOOL COMPLAINT FORM

AMERICAN SAMOA DEPARTMENT OF EDUCATION
American Samoa Department of Education
Non-Public School Complaint Form
School Year 2024-2025

The American Samoa Department of Education (ASDOE) will accept complaints that allege a violation of a federal education law or regulation that only the ASDOE has the jurisdiction, or authority, to regulate. The ASDOE Ombudsman has jurisdiction over and reviews complaints alleging a local school district's failure to meet the equitable services requirements
applicable to the following Every Student Succeeds Act (ESSA) grant programs:

☐ Title I Part A- LEA Grants;
☐ Title I Part B- State Assessments Grants;
☐ Title I, Part A- Supporting Effective Instruction;
☐ Title I, Part A- English Language Acquisition State Grants;
☐ Title IV, Part A- Student Support and Academic Enrichment Grants;
☐ Title V, Part B- Rural and Low Income School Programs.

Before bringing this allegation to the ASDOE Ombudsman, the complainant must make the best effort to resolve the issue directly with the project manager. The ASDOE Ombudsman may only review alleged violations that have occurred within two years of the date the ASDOE receives the complaint. Each form is limited to one complaint.

For more information on the Every Student Succeeds Act (ESSA) statute and requirements, refer to https://www.ed.gov/essa. *The ESSA-specific requirements for Non-Public School (NPS) equitable services are found in Sections 1117 (Participation of Children Enrolled in Private Schools - Title I, Part A) and 8501 (Participation by Private School Children and Teachers - Title I, Part A; English Language Acquisition State Grants- Title I, Parts A-EL, and Immigrants; and Title IV, Part A and B).*

Name of ASDOE Project (s)	
Name of NPS	

Complainant Information

Name:	Email:
Address:	
Position/Role:	

Complaint Information

The ASDOE Ombudsman reviews complaints only after the complainant has made a best effort to resolve the issue directly with the ASDOE project lead and only if the complaint is received within two years of the alleged violation. The complaint must allege a violation of ESSA equitable services requirements in the ESSA grant programs listed above.

Date of Alleged Violation:
ESSA Grant Program Involved in alleged violation:

Describe how the ASDOE violated ESSA requirements by failing to provide equitable services to the above NPS. Submit any additional detail or supporting documentation as an attachment.

Attachment Title:	Attachment Title:
Attachment Title:	Attachment Title:
Attachment Title:	Attachment Title:

Please provide a list of State Education Agency (SEA) personnel with whom you communicated in your best effort to resolve the issue. Be specific about the date and method of communication. Please attach a copy of any communication with the relevant SEA Personnel that occurred in writing, such as emails, letters, and text messages. If you require additional space to report your attempted communications, please provide additional details in an attachment.

Name of ASDOE Personnel (First Name, Last Name)	Date of Communication (MM/DD/YYYY)	Method of Communication (Phone, Email, Text, Letter, In-Person, Other)

Attachment Title:	Attachment Title:

Attachment Title:	Attachment Title:

Attachment Title:	Attachment Title:

Attachment Title:	Attachment Title:

HOW TO SUBMIT COMPLAINT FORM
_____

☐ Option 1: Email this completed form and any attachments to asdoe.federalgrantsoffice@doe.as

☐ Option 2: Mail a hard copy of this completed form and any attachments to:

ASDOE Ombudsman % June Seiuli
Federal Grants Management Office
P.O Box DOE
Pago Pago, AS 96799

The information you submit via this form is public to the extent allowed by law.

12. Definition of Terms

1. **Amendment:** A change in budget narrative
2. **ASDOE:** American Samoa Department of Education, the single unitary department under the American Samoa Government that oversees the whole education system from K3-12.
3. **ASG:** American Samoa Government
4. **Applicant:** A entity seeking funding (grant) from a funder.
5. **Budget:** An applicant's financial plan showing use of funds for carrying out project objectives, services, or activities as found on the budget narrative form and on other budget documents required by the funder.
6. **Budget Period:** The internals of time into which a project is divided for budgetary purposes.
7. **Carryover:** Funds remaining at the end of the grant period that are made available to grantees; this allows grantees to use unobligated balances from the prior fiscal year in the current year.
8. **Conflict of Interest:** A situation in which an individual is in a position to derive personal benefit from actions or decisions made in their official capacity; this requires that the individual must disclose in writing any potential conflict of interests in accordance with applicable federal and/or state laws or policies.
9. **CRF:** Appreviated for Code of Federal Regulations.
10. **Disbursement:** Payment made in cash, by check, or via other electronic means.
11. **Discretionary Grant**: programs award funds using a competitive process
12. **EDGAR:** Stands for Education Department General Administrative Regulations
13. **Equipment:** A non-expendable item, an instrument, a machine, instructional skill-relating device, or a set of small articles whose parts are replaceable or repairable, with a useful life of more than one year.
14. **Formula Grant**: Is a type of mandatory grant awarded based on a formula or set of criteria for specific types of work that is typically outlined in legislation or regulation.
15. **Grant:** A sum of money given by an organization, especially a government, for a particular purpose; also known as Project Award
16. **Grantee:** The entity that receives or is awarded a grant; also known as project recipient
17. **Liquidation:** 120 days following the obligation period for pay out
18. **Mandatory Disclosure:** Must disclose, in a timely manner and in writing, all violations of criminal law involving fraud, bribery, or gratuity violations potentially affecting the project award.
19. **MOE**: abbreviation for Means of Evaluation

20. **Monitoring:** Actions, activities, and practices used to determine that funds are used, and programs are operated in accordance with applicable federal and local statues and regulations.
21. **Obligation:** Funding that is committed to a specific purchase or service
22. **Project:** Services or activities that a grantee agrees to provide a specific requirements or restrictions to be imposed by the funder.
23. **Project Application:** An entity's request for a grant under state or federal education programs
24. **Project Period:** The length of time for which a project has been authorized/awarded
25. **Supplement, Not Supplant:** The purpose of a supplement, not supplant provision is to help ensure that federal grant funds are expended to benefit the intended population defined in the authorization stature, rather than being diverted to cover expenses that the SEA or LEA would have paid out of other funds in the event the federal runds were not available. In this way, the federal government can ensure that the level of state and local support for a program remains at least constant and is not replaced by federal funds. Penalties for supplanting are often severe. All federal funds involved in a supplant normally must be returned to the federal government. Since audits are usually conducted after the grant period has ended, there is often no other alternative corrective action available other than returning the funds.
26. **Supplies:** All expendable property(excluding equipment, intangible property, and debt instruments) that are consumed, worn out, or deteriorated in use or that lost their identity through fabrication or incorporation into a different or more complex unit or substance.
27. **USDOE:** Appreviation for the United States Department of Education

13. EDGAR & Uniform Guidance

- Financial Management: An LEA (or its agent) must use fascal control and fund accounting procedures that ensures proper disbursement of and accounting for SRSA funds. In general, an LEA must expand and account for Federal funds in accordance with Federal laws and regulations. In addition, LEA accounting systems must satisfy Federal requirements regarding the ability to track the use of funds and permit the disclosure of financial results. LEAs must also have written procedures for determining cost allowability and must maintain effective control over all funds. (EDGAR: 34 C.F.R. 75.702) Uniform Guidance: 2 C.F.R 200.302; 2 C.F.R. 200.303

- Use of Funds: An LEA can only use federal funds for allowable costs, as defined in the Uniform Administrative Requirements, Cost Principles, and Audit Requirements (2 C.F.R. 200) which includes, among other things, the requirements that costs be reasonable and necessary for the accomplishment of program objectives. An LEA must use CG funds to supplement, not supplant, any other Federal, State, or local education funds and may use CG funds carry out local activities authorized under any of the following provisions: Title, I, Part A, Title II, Part A, Title III, Title IV, Part A, Title V

- Equipment and Supplies: An LEA shall use, manage, and dispose of equipment and supplies purchased using Federal funds in accordance with all relevant federal laws and procedures. LEAs shall also ensure that equipment and supplies are used only for authorized purposes of the project during the period of performance or until no longer needed. (Uniform Guidance: 2 C.F.R. 200.313-314)

- Personnel: An LEA shall ensure that charges to Federal awards for salaries are based on records that accurately reflect the work performed. These records must be supported by a system of internal controls which provide reasonable assurance that the charges are accurate, allowable, and properly allocated. (Uniform Guidance: 2 C.F.R 200.430)

- Procurement: An LEA shall ensure that all relevant Federal procurement procedures are followed when procuring goods and services using Federal funds. (Uniform Guiance: 2 C.F.R 200.318)

- Period of Availability: An LEA may only charge a grant program for allowable costs incurred during the period of availability.

14: Reference

1. American Samoa Code Annotated A.S.C.A. (Updated August, 2021)
2. American Samoa Department of Education Grants Policy & Procedures Manual 2018
3. American Samoa Department of Education Monitoring Report, January 2024
4. Office of Elementary and Secondary Education Website
5. Updated SOP for the ASG Indirect Cost Proposal, March 6, 2024
6. American Samoa Government - General Memorandums
7. American Samoa Revised Constituion