



# USBE Internal Policies - Grants

Utah State Board of Education  
January 8, 2026

# Agenda

## 1. Internal Policy 01-08

1. Grant Management

## 2. Internal Policy 03-01

1. Federal Funds Request Summary
2. Secondary Approval Process for Federal Grants

## 3. Internal Policy 06-06

1. Board Authorization for Procurements



# USBE Policy 01-08

## Grant Management



# Overview of USBE Policy 01-08

- Pre-award activity, including seeking new grant funding, applying, or submitting proposals for grant funding, and accepting grant awards, is performed consistently and in a controlled manner to limit exposure to the USBE.
  - References Internal Policy 03-01
- Meaningful grant oversight is in place to control and monitor the use of grant funds.
- Grant programs, although managed utilizing a system/process, are consistently managed, and controlled.
- All individuals responsible for managing grants are aware of their roles and responsibilities in ensuring compliance with grant requirements.



# Overview of Policy 01-08

- Reviews responsibilities of USBE Financial Operations staff, Grant Managers, and the Grants Compliance Officer for grant awards.
- Outlines allocation components, reimbursement procedures, and grant closeout policies.
- Covers steps after USBE receives a grant.



# USBE Policy 03-01

## Grant Approval and Management



# Overview of USBE Policy 03-01

- Outlines the information Staff must report regarding federal grants and the date they must be reported to the Grants Compliance Officer for the Federal Funds Request Summary (primary approval process)
- Outlines the approval process for federal grants we apply for and receive outside of the FFRS timeline (secondary approval process)
  - Describes how to categorize a federal grant as low-impact, medium-impact, or high-impact
  - Outlines when a grant application or award must be presented to the Board
- Outlines compliance monitoring measures



# Federal Funds Request Summary

May - Grants Compliance Officer gathers preliminary federal grants from staff for next fiscal year.

October - USBE submits the FFRS to GOPB.

LFA may include the FFRS on the base budget bill, as directed by the EAC.

FFRS is presented to the Board on the Consent Calendar.

GOPB submits the FFRS to LFA.

The Legislature passes an appropriations act with federal funds, which constitutes legislative approval of the associated grants.





# Secondary Approval Process

- Any grant not included on the FFRS must go through this secondary approval process, as outlined in Policy 03-01.
- Staff should notify the Grants Compliance Officer of all new or renewal federal grants prior to submitting the application to the federal awarding agency.
- The grant will go before the Board on the Consent Calendar.
- Grants are placed into one of these categories:
  - Low-Impact
  - Medium-Impact
  - High-Impact



# Impact Categories

	\$ Threshold	FTE	New State \$ or Match
<b>Low-Impact</b>	\$1 million or less annually	No additional FTE	\$0
<b>Medium-Impact</b>	More than \$1 million but less than \$10 million annually	More than 1 but less than 11 FTE	Between \$1 and \$1 million
<b>High-Impact</b>	More than \$10 million annually	More than 11 FTE	More than \$1 million



# Low-Impact Procedure

- Submit the Terms and Conditions to the USBE Attorney General for review.
- Provide notice to the Board of the application or reauthorization.
  - The grant application is placed on the Board's consent calendar, and they must approve it in order to move forward in the process.
- A change in status from application to awarded must be reported to the Board at the next monthly meeting.
- The Grants Compliance Officer reports that awarded federal grant to the EAC, LFA, and the Office of Legislative Research and General Counsel.
  - The Grants Compliance Officer also notifies the respective USBE section, the Accounting staff, and the Audit/Finance Analyst.



# Medium-Impact Procedure

- The same process for the Low-Impact federal grants, as well as the following:
- Reports to the EAC of the approval status by the Board.
- The EAC may:
  - Recommend the agency accept the new federal funds;
  - Recommend the agency not accept the new federal funds; or
  - Recommend to GOPB that the Governor call a special session to review and approve or reject the acceptance of the new federal funds.
- It is not considered approved until ratified by the EAC or the GOPB, as outlined above.
- USBE reports approval status to the Board on its next monthly consent calendar.



# High-Impact Procedure

- The same process for the Low-Impact federal grants, as well as the following:
- USBE reports to the EAC, LFA, and GOPB, the approved status by the Board.
- The full legislature must approve a high-impact grant in a legislative session before the grant may be executed.
- USBE reports approval status to the Board on its next monthly consent calendar.



# Private Grants and Interagency Agreements

- Prior to applying or accepting an award, a USBE employee shall notify the Grants Compliance Officer of a new private grant proposal, application, renewal, or interagency agreement that involves the acceptance of awarded funds.
- The Grants Compliance Officer must provide a report to the board of any new grant applications with applicable impact category.
- Then follow the same approval process that is used for federal grants, depending on impact category.



# USBE Policy 06-06

Board Authorization for Procurements

# Overview of USBE Policy 06-06

- Outlines the procedure for obtaining Board consent to finalize certain procurement agreements.
- The Board reviews and approves all contracts, interagency agreements, and memoranda of understanding, as described in this policy.





# Procedure

- Any agreement that exceeds \$100,000 may not be executed by USBE until the Board has formally approved the agreement.
- The Purchasing Director shall submit a list summarizing all agreements for Board review and approval, including an electronic copy of all agreements on the list, to the Board's secretary at least two business days before a Board meeting where the agreements are to be discussed.
  - These documents will be added to the Board's Consent Calendar.
- The Purchasing Director, or designee, will be available to answer questions regarding the agreements and the procurement process that created the agreement.
- The USBE staff section shall make a representative available to answer substantive questions regarding the agreement.



# Questions

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